

RICHARD WORLEY V. DEPUTY DANNY LAWRENCE, ET AL.

Danny Lawrence - 08/15/2018

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF MISSISSIPPI
3 JACKSON DIVISION

4 RICHARD WORLEY PLAINTIFF

5 V. CAUSE NO. 4:17-cv-193 SA/JMV

6 DEPUTY DANNY LAWRENCE, Individually and in his
7 Official Capacity as a Deputy of the Grenada
8 County Sheriff's Office; DEPUTY BRYAN GRIFFITH,
9 Individually and in his Official Capacity as a
10 Deputy of the Grenada County Sheriff's Office;
11 DEPUTY RANDY SWEAT, Individually and in his
12 Official Capacity as a Deputy of the Grenada
13 County Sheriff's Office; DEPUTY TIM GHOLSTON,
14 Individually and in his Official Capacity as a
15 Deputy of the Grenada County Sheriff's Office;
16 DEPUTY DONNY WILLIS, Individually and in his
17 Official Capacity as a Deputy of the Grenada
18 County Sheriff's Office; JOHN DOES I-X,
19 Individually and in his Official Capacity as a
20 Deputy of the Grenada County Sheriff's Office;
21 SHERIFF ALTON STRIDER, Individually and in his
22 Official Capacity as a Sheriff of the Grenada
23 County Sheriff's Office; GRENADA COUNTY,
24 MISSISSIPPI DEFENDANTS

25 *****

17 DEPOSITION OF DANNY LAWRENCE

18 *****

20 DATE: WEDNESDAY, AUGUST 15, 2018
21 PLACE: GORE, KILPATRICK & DAMBRINO
22 2000 GATEWAY, SUITE 160
JACKSON, MISSISSIPPI
TIME: 1:53 p.m.

23

24 BETHANY CAMMACK
Certified Shorthand Reporter
25 Mississippi CSR No. 1526

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1	APPEARANCES	
2		
3	ANDREW C. CLARKE Attorney at Law 4 6256 Poplar Avenue Memphis, Tennessee 38119 5 901.680.9777 aclarke@accfirm.com 6 Counsel for Plaintiff 7	
8	MARY MCKAY GRIFFITH DANIEL "DANNY" GRIFFITH Jacks Griffith Luciano 9 150 North Sharpe Avenue Cleveland, Mississippi 38732 10 662.843.6171 mgriffith@jlpalaw.com 11 dgriffith@jlpalaw.com Counsel for Defendants 12	
13	KATELYN A. RILEY Allen, Allen, Breeland & Allen 14 Post Office Box 751 Brookhaven, Mississippi 39601 15 601.833.4361 kriley@aabalegal.com 16 Counsel for Defendant Bryant Griffin 17 18 19 20 21 22 23 24 25	
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1	DANNY LAWRENCE, 2 having been first duly sworn, 3 was examined and testified as follows: 4 EXAMINATION	
5	BY MR. CLARKE:	
6	Q. Would you please state your full name?	
7	A. Danny Joe Lawrence.	
8	Q. And what's your address?	
9	A. 891 Gillon Road.	
10	Q. And we'll keep that -- I mean, this is in	
11	case we have to serve a subpoena or get in touch --	
12	A. I'm in the middle of moving.	
13	Q. Oh, okay.	
14	A. Okay. Next week, it should be different.	
15	Q. Okay. All right. Have you ever given a	
16	deposition before?	
17	A. In a civil matter, yes, sir.	
18	Q. And under what circumstances?	
19	A. Someone had left a gathering and had a	
20	wreck, and his airbags didn't deploy. And we had	
21	to give our side of the story of what happened	
22	leading up to his accident.	
23	Q. Were you in pursuit of them?	
24	A. Oh, no. This was all between a	
25	manufacturer and the person who's permanently	

844.533.DEPO

EXHIBIT B - DEPOSITION OF DANNY LAWRENCE

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1 disabled from it.	1 A. Yes, sir.
2 Q. Was your testimony involving you going to	2 Q. Another thing that happens a lot of times
3 the scene of this accident as a law enforcement, or	3 when you're in a conversation, you kind of have an
4 were you a civilian?	4 idea of what my question's going to ask, and before
5 A. No, sir. This was prior to law	5 I get done, you may start to answer. And, listen,
6 enforcement.	6 I do the same thing too. Sometimes I think your
7 Q. All right. Well, the reason why I ask	7 answer's over, and I start asking my next question.
8 that, I want -- any other time you gave a	8 But we can't do that, because the court reporter
9 deposition?	9 needs to be able to take down the full question and
10 A. No, sir.	10 full answer. She can't type while we're both
11 Q. Okay. Obviously, I just want to kind of	11 talking. Okay?
12 go over some ground rules to make sure that we	12 A. Yes, sir.
13 communicate effectively. All right?	13 Q. So I know I'll make this mistake during
14 A. Yes, sir.	14 this depo, and that -- you know, if you hadn't
15 Q. Obviously your testimony here is under	15 finished, tell me to let you finish. All right?
16 oath, subject to the penalty of perjury. Do you	16 A. Yes, sir.
17 understand that?	17 Q. Obviously your testimony here is important
18 A. Yes, sir.	18 to all the parties and the court and the jury if it
19 Q. Now, a lot of times when we get in	19 goes to trial. So I don't want you to answer a
20 conversations, we kind of say uh-huh or huh-uh or	20 question if you don't understand it. Okay?
21 nod our head, and the court reporter can't take	21 A. Yes, sir.
22 that down. So --	22 Q. If you don't understand a question, if
23 A. Yes, sir.	23 you'll ask me to rephrase it, I will if I can. All
24 Q. Please give audible answers, "Yes," "No,"	24 right?
25 "I don't know," or explain your answer. Okay?	25 A. Yes, sir.
Page 8	Page 9
1 Q. And if you answer a question, I'm going to	1 A. It is one of them.
2 assume you understood that. Is that fair?	2 Q. Okay.
3 A. Yes, sir.	3 A. This was the first.
4 Q. All right. Before you came in for your	4 Q. Let me put a number 1 on -- can you put
5 deposition, other than speaking with your	5 that down there on the bottom somewhere?
6 attorneys, did you review anything, any documents?	6 A. Just anywhere?
7 A. In what time period? In the past couple	7 COURT REPORTER: On the right-hand
8 of years or . . .	8 side if possible.
9 Q. Since this incident.	9 THE WITNESS: Good enough?
10 A. Yes, sir, a couple of times.	10 COURT REPORTER: Yeah, good.
11 Q. What have you reviewed?	11 (EXHIBIT 1 WAS MARKED FOR THE RECORD.)
12 A. I reviewed my report.	12 MR. CLARKE: What other -- I'm not
13 Q. Okay. And your report is -- is it your	13 aware of any other. Can we go off the record for a
14 incident report?	14 second?
15 A. Yes, sir.	15 (OFF THE RECORD.)
16 Q. Let me show you -- I don't have another	16 MR. CLARKE CONTINUED:
17 copy of it. And if you'll say on the record --	17 Q. Did you write another report?
18 there's some Bates numbers down at the bottom	18 A. Yes, sir.
19 right-hand corner.	19 Q. And was it an incident report? What type
20 A. Yes, sir.	20 of report?
21 Q. Like CO --	21 A. It was 30 to 45 minutes, maybe an hour
22 A. Yes, sir.	22 after this first. . .
23 Q. What are the numbers?	23 Q. And it would have your name on it? Would
24 A. CO DEF 12, CO DEF 13, and CO DEF 14.	24 it have the same --
25 Q. Okay. Is that your incident report?	25 A. Yes, sir.

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<p style="text-align: right;">Page 10</p> <p>1 Q. -- incident report number? 2 A. It would have a separate incident. . . 3 Q. Okay. And I'll look when we have a break, 4 but I -- maybe I didn't see it. But you believe 5 you wrote a second incident report. Is that 6 correct? 7 A. Yes, sir. 8 Q. Would it be typed up on the same type of 9 format and the same computer program, just have a 10 different -- 11 A. I would hope -- yes, sir. 12 Q. I'm trying to get you to identify it. 13 Would it look like that report; it would just be a 14 separate report? 15 A. Yes, sir. 16 Q. All right. And I'm not trying to trick 17 you. I may have overlooked it. Okay. But I 18 thought that I went through everything. 19 A. Can I explain? 20 MS. GRIFFITH: And if we failed to 21 produce it, obviously we will. 22 MR. CLARKE: No, I'm not -- I'm just 23 trying to make sure while we're here, we -- 24 MR. CLARKE CONTINUED: 25 Q. Is there a way to get that faxed to you?</p>	<p style="text-align: right;">Page 11</p> <p>1 A. Yes, sir. 2 Q. I haven't seen one. If you're aware of 3 one -- I'm not trying to trick you. I mean, I went 4 through all the documents at lunch. Well, maybe 5 we'll see if we can get that done on a break -- 6 A. Yes, sir. 7 Q. -- before we get -- before we get going. 8 So it's your understanding you wrote two separate 9 incident reports? 10 A. Yes, sir. 11 Q. I guess the one that I showed you that we 12 marked as Exhibit No. 1, that would be of the 13 arrest, correct? 14 A. No, sir. 15 Q. What is -- what does that pertain to? 16 A. This is the initial call where he was at 17 Ms. Kitchens' mother's residence. 18 Q. Okay. All right. 19 A. And there's a separate one for my second 20 contact with him, and that's when I made the 21 arrest. 22 Q. Okay. Let me look at that for a second. 23 I'm sorry. So that's the first call you made? 24 A. Yes, sir. 25 Q. Other than that report that we marked as</p>
<p style="text-align: right;">Page 12</p> <p>1 Exhibit No. 1, and then a second report of the 2 arrest, did you complete any other documents? 3 A. I'm not sure if I did an actual arrest 4 report or not. I do not remember. 5 MS. GRIFFITH: And just for the 6 record, I'm emailing somebody at the SO to ask them 7 if they could send us. . . 8 MR. CLARKE: Right. Yeah. 9 MR. CLARKE CONTINUED: 10 Q. A lot of these things look the same. And 11 I'm not casting any, you know -- 12 A. Can I -- can I explain that? 13 Q. Yeah. 14 A. An arrest report, not everybody does them. 15 I typically do them. I'm one of the few that 16 actually types my arrest reports. And it will say 17 "Arrest Report" and what the charges were on it. 18 And it won't go into full detail. It will just 19 tell the charges he was arrested on, with his name. 20 Whether it was handwritten or typed. And I think 21 most of mine are typed. 22 (EXHIBIT 2 WAS MARKED FOR THE RECORD.) 23 MR. CLARKE CONTINUED: 24 Q. Let me show you what I'm marking as 25 Exhibit No. 2, which is CO DEF 11, and that's the</p>	<p style="text-align: right;">Page 13</p> <p>1 only other thing that I found pertaining to the 2 arrest, and see if you can identify that. 3 A. Yes, sir, that is -- 4 Q. Is that something that you complete? 5 A. No, sir. The jail completes this. This 6 is a booking sheet. 7 Q. Okay. So you didn't complete that? 8 A. No, sir. 9 Q. Okay. So there should be a separate 10 incident report about the -- about the arrest, 11 correct? 12 A. Yes, sir. 13 Q. And you don't know one way or the other, 14 but your habit was to create an arrest report, 15 correct? 16 A. Typically, yes, sir. 17 Q. Do you know if you reviewed an arrest 18 report at any time since the lawsuit was filed up 19 until you got ready for your deposition? 20 A. I can't honestly say either way. I'm 21 thinking. 22 Q. And I understand. That's fair. I'm just 23 trying -- 24 A. I'm not going to lie. 25 Q. And I understand everything you're saying.</p>

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<p style="text-align: right;">Page 14</p> <p>1 I'm just trying to -- the potential documents that 2 could be there in addition to what we've marked as 3 Exhibit No. 2 are a second incident report that 4 pertains to the actual arrest of Mr. Worley, 5 correct?</p> <p>6 A. Could you say that again?</p> <p>7 Q. Yes. The first one that we marked as 8 Exhibit No. 1, that is an incident report that you 9 completed from the first contact you had with 10 Mr. Worley at his mother-in-law's house or 11 something, correct?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Okay. There should be another incident 14 report about the arrest that occurred at the levee, 15 right? Or wherever it was.</p> <p>16 A. Yes, sir. Below the levee, yes, sir.</p> <p>17 Q. Okay. There could be, and you can't 18 recall right now, an arrest report where you typed 19 up something in addition to a second incident 20 report, correct?</p> <p>21 A. Yes, sir. Either handwritten or typed-up 22 arrest report.</p> <p>23 Q. Okay. And I'm going to -- we can look 24 through those and make sure that we have them. All 25 right. Anything else that you looked at? Did you</p>	<p style="text-align: right;">Page 15</p> <p>1 look at your interrogatory responses? 2 THE WITNESS: Is that the thing that 3 we had to sign? 4 MS. GRIFFITH: (Nods head 5 affirmatively.)</p> <p>6 MR. CLARKE CONTINUED:</p> <p>7 Q. The thing -- 8 A. Yes, sir.</p> <p>9 Q. -- you had to sign, yeah.</p> <p>10 A. Two different occasions. 11 MR. CLARKE: I'll mark as Exhibit 12 No. 3 a copy of the interrogatory responses. (EXHIBIT 3 WAS MARKED FOR THE RECORD.)</p> <p>13 MR. CLARKE: There you go. 14 MS. GRIFFITH: Oh, thank you. 15 MR. CLARKE: I attached all those at 16 the end of it.</p> <p>17 THE WITNESS: Is there a question? 18 MR. CLARKE CONTINUED:</p> <p>19 Q. Did you review those before you signed the 20 oath page at the end? 21 A. Yes, sir.</p> <p>22 Q. Okay. So all the statements in there are 23 true and accurate to the best of your knowledge, 24 information, and belief?</p>
<p style="text-align: right;">Page 16</p> <p>1 MS. GRIFFITH: And just so the record 2 reflects, I believe you stated -- you told me that 3 there is one correction that you need to make. 4 THE WITNESS: Yes, ma'am. Okay. 5 MR. CLARKE CONTINUED:</p> <p>6 Q. Do you know what the correction is? 7 A. Somewhere -- and I never really saw it the 8 other day.</p> <p>9 Q. Well, if you can just tell me about it, 10 and then we can try to figure out -- however you 11 want to do it.</p> <p>12 A. There it is right there. I see it today. 13 Number 5, end of page 2.</p> <p>14 Q. Okay.</p> <p>15 A. Somewhere I completely did not see that, 16 and I still didn't see it the other day.</p> <p>17 Q. Asking about your criminal record? 18 A. Yes, sir.</p> <p>19 Q. Okay. And what should -- what should the 20 change be?</p> <p>21 A. I have been arrested.</p> <p>22 Q. For what?</p> <p>23 A. Disorderly conduct twice in Lee County.</p> <p>24 Q. When did that occur?</p> <p>25 A. Around the '82 -- '81-'82 timeframe.</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. When you were young enough to be 2 disorderly? 3 A. Yes, sir. Before I joined the military. 4 Q. Okay. So we'll just take this testimony 5 as an amendment to that. 6 A. Then there was -- 7 MS. GRIFFITH: Thank you. 8 THE WITNESS: -- one other time in 9 Grenada, they arrested me for a DUI, but it was 10 thrown out. It was an open container. I went 11 against -- well, I won the case. 12 MR. CLARKE CONTINUED: 13 Q. Okay. When did that happen? 14 A. '90. 1990 timeframe. 15 Q. Before the military? 16 A. It was in the military, yes, sir. The 17 military brought me here in '88. 18 Q. Okay. All right. And that was one where 19 you were arrested, and you went to court? 20 A. Yes, sir. 21 Q. And the charges were dismissed? 22 A. Yes, sir. 23 Q. Okay. The other two, did you just plead 24 guilty to? 25 A. I pled guilty. On one case, I pled</p>

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<p style="text-align: right;">Page 18</p> <p>1 guilty, the other fellow pled guilty, I paid my 2 fines, and loaned him the money for his fines. 3 Q. Okay. 4 COURT REPORTER: And you said that 5 was Leake County? 6 THE WITNESS: Lee County. Tupelo. 7 COURT REPORTER: Lee. 8 THE WITNESS: Lee, L-e-e. 9 COURT REPORTER: Thank you. 10 MR. CLARKE CONTINUED: 11 Q. All right. Any other things that you saw 12 in those interrogatories? 13 A. Only thing that... 14 THE WITNESS: Did anybody ever answer 15 No. 6 about the military? 16 MS. GRIFFITH: (No audible response.) 17 MR. CLARKE CONTINUED: 18 Q. Yeah, No. 6 talks about military. Why 19 don't you just tell me your military service. 20 Because it's not in the documents they produced 21 that's here in front of me. 22 A. I joined the military December of '80, and 23 served until the end of November of 2013. Zero 24 administrative action and received no disciplinary 25 actions. Secret security clearance for 20 plus</p>	<p style="text-align: right;">Page 19</p> <p>1 years. I retired out of the military 27 and a half 2 years active duty. 3 Q. Okay. Thank you for your service. 4 A. Thank you, sir. 5 Q. Did you serve overseas? 6 A. Yes, sir. One full year. Twelve months. 7 Q. Again, double thank you for your service. 8 MR. CLARKE: All right. We'll count 9 that as an amendment. 10 MS. GRIFFITH: (Nods head 11 affirmatively.) 12 MR. CLARKE: You don't have to do the 13 paperwork. 14 MS. GRIFFITH: Thank you. 15 THE WITNESS: That's the only two 16 that I remember -- 17 MR. CLARKE CONTINUED: 18 Q. Okay. And you were honorably discharged 19 and everything? 20 A. Yes, sir. 21 Q. What branch were you in? 22 A. Army. 23 Q. Army? 24 A. Yes, sir. 25 Q. All right. We'll go through a little bit</p>
<p style="text-align: right;">Page 20</p> <p>1 of background. Tell me about your educational 2 background. Did you graduate from high school? 3 A. Yes, sir. 4 Q. Where did you graduate from high school 5 and when? 6 A. Shannon High School, June of -- May or 7 June of '81. 8 Q. And where is Shannon High School? 9 A. Lee County. Outside of Tupelo. South of 10 Tupelo. 11 Q. Is that where you were born and raised? 12 A. No, sir. I was born in Canada on a naval 13 station. 14 Q. Okay. 15 A. All of my family pretty well lived in 16 Louisiana, Central Louisiana. And my father was on 17 a second tour in 'Nam, my mother divorced him and 18 moved in with some friends in Lee County. 19 Q. Okay. You graduated -- you were living in 20 Mississippi for high school? 21 A. Yes, sir. 22 Q. Graduated from high school. Did you have 23 any post high school education? 24 A. Yes, sir. I've got a little over 100 25 hours of college. I never completed a degree plan,</p>	<p style="text-align: right;">Page 21</p> <p>1 so it's just hours. I never got a degree. 2 Q. What was your concentration or your focus? 3 A. I didn't do a degree plan, so it was just 4 whatever was offered to me through the military. 5 Q. Okay. 6 A. They say, "We're doing these courses. You 7 want in?" I said, "Sure." 8 Q. So you took advantage of the educational 9 opportunities provided you by the Army? 10 A. Yes, sir. 11 Q. And did you have those at all different 12 types of facilities, colleges, or... 13 A. Hinds and William Carey College were the 14 two. 15 Q. Okay. All right. And so no degree, but 16 you said roughly 100 hours or so? 17 A. A little over 100. Between 100 and 120. 18 I'd have to pull the transcripts. 19 Q. Okay. All right. And take me through 20 your employment history up to the present. Just 21 start from -- I don't care about little jobs. I 22 mean significant employment that you had after 23 graduating from high school. 24 A. After graduating, I worked in a factory, 25 in Tupelo Furniture Factory until July of '88. I</p>

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1 took a full-time position with the Mississippi Army 2 National Guard, which moved me to Camp McCain. 3 Q. Camp McCain? 4 A. Camp McCain. Just south of here at 5 Elliot. And that's where I stayed active -- well, 6 I never really moved until 2014. I volunteered to 7 go -- or to transfer to a unit in Crystal Springs. 8 And about three weeks later, of course we got our 9 deployment notification, and we spent most of '14 10 training to go. I left, I think, the 3rd of 11 January of '15, got back late December of '15. 12 I took another position to get me back in 13 Grenada. And stayed there roughly a year, and then 14 was selected to be over a recruit sustainment 15 program in Northwest Mississippi. It was my job 16 and my staff's job duties to get all new trainees 17 in Northwest Mississippi trained, ready to go to 18 basic training. They didn't go until I said they 19 were ready. 20 Q. Okay. And all those different positions 21 and movements were while you were employed by the 22 Army? 23 A. Yes, sir. 24 Q. You didn't have any other part-time jobs, 25 law enforcement jobs during that time?	1 A. I did some work with Steve's Pest Control, 2 which no longer exists. I started law enforcement, 3 I think, December of 2009 with the police 4 department, sheriff's department. And then 2010, 5 from January through May, two nights a week, couple 6 of weeks at one span and a couple of weekends, went 7 with the part-time military academy in Grenada. 8 Q. All right. Well, when is the first time 9 you put on a police officer's badge? 10 A. December, January of 2009, I started 11 riding with the police department. 12 Q. And which police department? 13 A. Grenada. 14 Q. The city? 15 A. City, yes, sir. 16 Q. Okay. Did you have to go to any kind of 17 academy before you -- 18 A. That's the part-time academy I was telling 19 you about. Grenada County had a -- they held a 20 certified law enforcement officers training 21 academy, LEOTA, certified academy here for 22 part-time. 23 Q. Okay. So in 2009, you went to the LEOTA 24 academy? 25 A. Started in January of 2010.
Page 24	Page 25
1 Q. Okay. 2 A. And went through towards the -- May of 3 2010. 4 Q. And there's two different academies. 5 There's a part-time academy and there's a full-time 6 academy, correct? 7 A. Yes, sir. Yes, sir. 8 Q. So in January of -- and there's a period 9 of time after you hire on before you have to go to 10 the academy, correct? Because I think you said you 11 started putting on a badge in 2009. 12 A. You really don't hire on. You volunteer 13 your time. 14 Q. Okay. So in 2009, you volunteered your 15 time? 16 A. Yes, sir. 17 Q. When you were with the City of Grenada, 18 did they have any training before you went on, or 19 was it on-the-job training? 20 A. It was -- if I was in a car, it was 21 minimal time. Right after that, a couple of weeks, 22 you had the holidays, and then right after that, 23 the academy started. So two nights a week, several 24 weekends, and there was a two-week period. 25 Q. Did you have to -- I'm sorry. I didn't	1 mean to interrupt you. 2 A. I'm sorry. Go ahead. 3 Q. Did you have to qualify with a firearm 4 before you went out in a car? 5 A. Yes, sir. 6 Q. And did you do that at the City of 7 Greenville? 8 A. City of Grenada. 9 Q. City of Greenville. I'm sorry. City of 10 Grenada. All right. So then you went to the 11 academy sometime in January of 2010, and the 12 reserve academy until sometime in May of 2010, 13 correct? 14 A. Yes, sir. 15 Q. And that actual academy was put on by the 16 County of Grenada, correct? 17 A. Yes, sir. 18 Q. All right. Now, did you then after you 19 got out of the part-time academy continue working 20 part-time for Greenville? 21 A. For Grenada. 22 Q. Greenville. Grenada. I'm sorry. 23 A. I'm paying attention. 24 Q. No, you're paying attention more than I 25 am. And I apologize for that.

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<p style="text-align: right;">Page 26</p> <p>1 So after you got out of the academy, you 2 were then a reserve or a part-time for the City of 3 Greenville? 4 A. Grenada. 5 (OFF THE RECORD.) 6 THE WITNESS: Yes, sir, Grenada. 7 MR. CLARKE CONTINUED: 8 Q. City of Grenada. 9 A. And somewhere in that time period, I rode 10 a couple of times or did some work with the county. 11 Q. Okay. So when you were certified as a 12 reserve officer, how did you get your assignments 13 with the City of Grenada? 14 A. There's really no assignments. The only 15 requirements for the city on the reserve side is, 16 you do a minimum of eight hours a month. You 17 volunteer that. At the time, there was no pay at 18 all when I started. 19 You had to meet a mandatory meeting the 20 first Tuesday of every month for a reserve meeting, 21 and you had to do -- they have a food pantry here 22 the fourth Saturday morning of every month, and you 23 -- as mentor, you work it, traffic control and 24 crowd control. 25 And they had a rotation of city council</p>	<p style="text-align: right;">Page 27</p> <p>1 meetings. Had two reserves that worked as -- to 2 keep the peace at the city council. 3 Q. Okay. And at some point, you said while 4 you were a reserve officer for the City of Grenada, 5 you had rode sometimes with county. How did that 6 come about? 7 A. I had joined both of them. 8 Q. Okay. 9 A. I could do either one. There's two 10 different structured environments for them. The 11 reserve for Grenada police has a -- the city police 12 has a reserve, reserve only, which has full arrest 13 of powers -- full arrest powers. The county has a 14 reserve, part-time, and full-time, and only 15 part-time and full-time have arrest powers. 16 Q. So reserve for Grenada County are not 17 allowed to make arrests? 18 A. Unless in the presence of a part-time or 19 full-time. 20 Q. So when you got out of the academy, you 21 could work as reserve for either the city or the 22 county based on your certification? 23 A. Yes, sir. 24 Q. And the city had a different type of 25 program than the county did?</p>
<p style="text-align: right;">Page 28</p> <p>1 A. Yes, sir. 2 Q. City had certain requirements you had to 3 make with the number of hours and other type of 4 functions, like you said, being at city council 5 meetings or the food pantry, correct? 6 A. Yes, sir. 7 Q. Have you ever been -- are you now a 8 full-time deputy? 9 A. No, sir. 10 Q. Okay. So what is your status with the 11 City of Grenada -- I mean, the County of Grenada? 12 A. County of Grenada? Part-time. I went 13 part -- excuse me. 14 Q. When did you go from -- was there a time 15 -- as a part-time with the county, you can make 16 arrests, correct? 17 A. Yes, sir. 18 Q. When did you go from -- and I don't know 19 if I'm using the terminology right. Is it reserve, 20 part-time, and then full-time, three different 21 distinctions under the county? 22 A. Yes, sir. 23 Q. Reserve, is it -- under the county policy, 24 do they always have to ride with a certified 25 officer?</p>	<p style="text-align: right;">Page 29</p> <p>1 A. 99 percent of the time. There's a very 2 few exceptions. 3 Q. What are the exceptions? 4 A. We've got some motorcycles. And at the 5 time, there was four of us or five of us that were 6 all reserve officers, and we were the only ones 7 that rode them. 8 Q. Okay. 9 A. Now there's two of us part-time and one 10 reserve. If two of us couldn't make it, the 11 reserve could, as escorts. It's for the governor, 12 for the highway patrol, for the county, for 13 funerals, things like that. 14 Q. Could a reserve for the county write 15 traffic tickets? 16 A. I don't know the answer to that. I don't 17 think it's ever been done, but I don't know the 18 answer to it. 19 Q. Well, most of the time, these reserves 20 would be with a full-time officer who would fill 21 that out, correct? 22 A. Yes, sir. 23 Q. Okay. When did you go from being a 24 reserve with the county to a part-time employee 25 with the county?</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. I'm guessing November or December of 2012. 2 I was on my way out of the military. 3 Q. Okay. And when you went to part-time, did 4 you then have a more normal actual weekly schedule 5 that you had to show up on? 6 A. Yes, sir. 7 Q. And how many hours is part-time? I'm 8 trying to figure out -- 9 A. Yes, sir. Anywhere from no hours up to -- 10 I have done more than -- well, 40, 40 hours a week. 11 Q. Do you know of any MLEOTA standards as to 12 the number of hours that a part-time officer is 13 allowed to work? 14 A. Can I retract that and rephrase it? 15 Q. Sure. 16 A. I have done up to that many hours. 17 There's the -- MLEOTA, there's a thing in emergency 18 situations -- when I was first hired on, they had 19 me working as animal control, which is a part-time 20 officer, for the county a few hours a week. And 21 then the other few hours a week, I would be working 22 as a deputy. I'd be in the same vehicle, but the 23 duties were different. 24 Q. Okay. 25 A. But I could also respond to calls if I</p>	<p style="text-align: right;">Page 31</p> <p>1 wasn't doing anything as far as animal control. 2 Q. Are you aware of any requirements under 3 MLEOTA as to the number of hours a part-time 4 officer can work before they have to be a certified 5 officer? 6 A. It's my understanding there's a monetary 7 amount that they say you can make. I'm not sure of 8 the amount, but there's a -- and there's a couple 9 of -- MLEOTA says a monetary amount. And I'm 10 trying to figure out on the county side, because 11 the pay's more. It's either 16 or 24 hours 12 equates -- around the 20, 24 hour equates to the 13 monetary amount that MLEOTA allows you to work. 14 Q. Are you still in any way working as a 15 reserve for the City of Greenville today? 16 A. Grenada. And can you -- can you rephrase 17 that, please? 18 Q. When you went part-time with the county -- 19 A. Yes, sir. 20 Q. Did you continue working as a reserve for 21 the city? 22 A. Yes, sir. 23 Q. Do you continue to work for the city as a 24 reserve today? 25 A. That's going to take a little bit more</p>
<p style="text-align: right;">Page 32</p> <p>1 than a yes or a no. It's -- 2 Q. Well, I mean -- 3 A. Okay, okay. I just took -- 4 MS. GRIFFITH: You can explain. 5 THE WITNESS: Okay. I just took this 6 job. It gives me benefits. So I'm still on the 7 reserve, but -- 8 MR. CLARKE CONTINUED: 9 Q. Roster? 10 A. Roster. It's still up in the air with 11 human resources whether or not I can because I'm 12 salaried. The chief and all the captains say I can 13 still work because they consider it coming out of a 14 different department. The woman over human 15 resources says I can't. They're going through it 16 right now. I plan on working Saturday, whether 17 it's volunteer or getting paid. 18 Q. For Green- -- for the city? 19 A. For Grenada, yes, sir. 20 Q. I just -- I honestly apologize. I just -- 21 a block. 22 A. But since I've took this, I haven't been 23 able -- for six weeks, I've been focusing on my 24 next retirement. 25 Q. Well, from what I understand, sometime in</p>	<p style="text-align: right;">Page 33</p> <p>1 December or the end of 2012, beginning of 2013, you 2 became part-time with the county. 3 A. Yes, sir. 4 Q. Since December or January -- December of 5 2012 or January of 2013, have you ridden or served 6 or been out on the streets as a reserve for the 7 City of Grenada? 8 A. Can you repeat that? 9 Q. Yes. Since you went part-time with the 10 county, have you rode as an officer for the city? 11 A. Yes, sir. 12 Q. Okay. And when I asked you the question, 13 Are you still working for Greenville right now, 14 there's apparently some kind of analysis going on 15 as to whether or not you can still serve as a 16 reserve for the City of Grenada based on your 17 position with the county. Is that correct? 18 A. Based on my position with the city. I'm a 19 salaried city employee. I'm a department head. 20 Q. What do you do now? 21 A. Airport manager. 22 Q. Okay. That's okay. So you're no longer 23 in law enforcement? 24 A. I'm still in law enforcement. 25 Q. Okay. But you're no longer -- are you a</p>

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<p>1 part-time deputy with the county?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. You're also a reserve, pending</p> <p>4 whatever this analysis is, reserve with the City of</p> <p>5 Greenville, correct?</p> <p>6 A. Grenada. Yes, sir.</p> <p>7 Q. Grenada. Okay. All right. And you're</p> <p>8 also the airport manager for the city?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Okay. So you have three hats on right</p> <p>11 now?</p> <p>12 A. Yes, sir.</p> <p>13 Q. At least.</p> <p>14 A. Yes, sir.</p> <p>15 Q. Okay. What is your normal schedule with</p> <p>16 the county?</p> <p>17 A. Prior to this -- prior to this, it was</p> <p>18 every Monday and Friday. Monday, Thursday, and</p> <p>19 Friday.</p> <p>20 Q. Okay. And once this gets worked out, you</p> <p>21 don't know what your schedule will be with the</p> <p>22 county?</p> <p>23 A. Right now, it's on a basis of what I can</p> <p>24 do. I worked -- I've worked two days with the</p> <p>25 county since I took this position, 4th of July and</p>	<p>Page 34</p> <p>1 Sunday before last. I'm going to work the 26th. I</p> <p>2 know that already. I'm on the schedule.</p> <p>3 Q. All right. Now, so you've never been to</p> <p>4 the full-time police academy?</p> <p>5 A. No, sir.</p> <p>6 Q. And the part-time police academy, you went</p> <p>7 to in 2010, right? January?</p> <p>8 A. Yes, sir. Yes, sir.</p> <p>9 Q. Now, when you go to the part-time academy,</p> <p>10 they don't train you on the particular policies of</p> <p>11 a particular department, do they?</p> <p>12 A. I can only speak for the part-time. No,</p> <p>13 sir, because each department is individually --</p> <p>14 Q. Right. They're different policies.</p> <p>15 A. Different SOPs, yes, sir, standard</p> <p>16 operating procedures.</p> <p>17 Q. You just get your general law enforcement</p> <p>18 training for whatever the curriculum is for the</p> <p>19 state for the part-time academy, correct?</p> <p>20 A. Yes, sir.</p> <p>21 Q. All right. And the majority of the work</p> <p>22 that you do at the part-time academy is physical</p> <p>23 fitness, correct?</p> <p>24 A. No, sir.</p> <p>25 Q. Okay. Well, I mean, we can go to the</p>
<p>1 MLEOTA standards. I mean --</p> <p>2 A. Yes, sir.</p> <p>3 Q. -- they'll have the number of hours that</p> <p>4 you have to do them. But a big portion of it is</p> <p>5 physical fitness. You do that just about every day</p> <p>6 when you're in the academy, correct?</p> <p>7 A. Yes, sir.</p> <p>8 Q. All right. And you have different types</p> <p>9 of courses, correct?</p> <p>10 A. Yes, sir. They'll have classroom.</p> <p>11 Q. And you have -- you go to the firing</p> <p>12 range, correct?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Do you get on the track and do any</p> <p>15 emergency vehicle driving?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Did you have any training on ethics when</p> <p>18 you were in the part-time academy?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Were you -- did they discuss anything in</p> <p>21 there called "the code of silence"?</p> <p>22 A. I cannot answer that one.</p> <p>23 Q. Did you have any training that it's</p> <p>24 improper for officers to turn a blind eye if they</p> <p>25 see something going wrong from a fellow officer?</p>	<p>Page 36</p> <p>1 A. No, sir.</p> <p>2 MS. GRIFFITH: Object to the form.</p> <p>3 You can answer.</p> <p>4 THE WITNESS: Ma'am?</p> <p>5 MR. CLARKE CONTINUED:</p> <p>6 Q. You can answer.</p> <p>7 MS. GRIFFITH: I was objecting, but</p> <p>8 you can answer.</p> <p>9 THE WITNESS: Okay. No, sir.</p> <p>10 MR. CLARKE CONTINUED:</p> <p>11 Q. So you had no training on that?</p> <p>12 A. No, sir.</p> <p>13 Q. All right. Now, did you have training on</p> <p>14 proper arrest? You know, reasonable suspicion and</p> <p>15 probable cause and things of that nature?</p> <p>16 A. Yes, sir.</p> <p>17 Q. What does reasonable suspicion allow you</p> <p>18 to do?</p> <p>19 A. Reasonable suspicion only allows you to do</p> <p>20 reports and turn it over to investigators, if it's</p> <p>21 my understanding. In my understanding, if I</p> <p>22 suspect something, if I don't witness something, I</p> <p>23 have no arrest authority.</p> <p>24 Q. Do you know --</p> <p>25 A. Unless it's a warrant or I see it</p>

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<p style="text-align: right;">Page 38</p> <p>1 happening.</p> <p>2 Q. You don't know what the term "reasonable</p> <p>3 suspicion" means in law enforcement?</p> <p>4 A. Not the book word, no, sir.</p> <p>5 Q. Do you know what a Terry stop is? A Terry</p> <p>6 stop.</p> <p>7 A. Not the term, no, sir. Probable cause.</p> <p>8 Q. When you have probable cause, were you</p> <p>9 trained that that allows you to make a full-blown</p> <p>10 arrest?</p> <p>11 A. The probable cause. . . Could you -- I'm</p> <p>12 sort of confused about that.</p> <p>13 Q. Okay. There's certain levels of suspicion</p> <p>14 or evidence that you have that allow law</p> <p>15 enforcement officers to engage in certain</p> <p>16 activities. Do you agree with that?</p> <p>17 A. Yes, sir.</p> <p>18 Q. You can walk up to anybody on the street</p> <p>19 and say, "Hello. I want to talk to you," correct?</p> <p>20 A. Yes, sir.</p> <p>21 Q. If they don't want to talk to you, they</p> <p>22 don't have to, right?</p> <p>23 A. Yes, sir.</p> <p>24 Q. In order to be able to detain somebody and</p> <p>25 to stop them or arrest them, you have to have</p>	<p style="text-align: right;">Page 39</p> <p>1 probable cause, correct?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Once you have probable cause, you can</p> <p>4 arrest them, bring them to jail, correct?</p> <p>5 A. If there is a crime committed, yes, sir.</p> <p>6 Q. Right. And that would be the probable</p> <p>7 cause, right?</p> <p>8 A. Well, probable cause isn't always the</p> <p>9 reason they get arrested. Like a seatbelt, wearing</p> <p>10 a seatbelt, you can stop them on that, then you can</p> <p>11 educate them on it. But if you happen to see. . .</p> <p>12 Q. But you can't arrest for a traffic</p> <p>13 offense. That's not a crime, correct?</p> <p>14 A. Yes, sir, you can.</p> <p>15 Q. You can arrest on a traffic --</p> <p>16 A. Every ticketable offense is an arrestable</p> <p>17 offense. You're allowing them -- giving them</p> <p>18 the -- you're giving them -- you're entrusting them</p> <p>19 to show up in court on that offense. I can ask</p> <p>20 that the jail and the courts make somebody bond out</p> <p>21 on a traffic offense.</p> <p>22 Q. Have you done that?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Okay. I didn't know that.</p> <p>25 MR. GRIFFITH: Counsel, he's correct.</p>
<p style="text-align: right;">Page 40</p> <p>1 Under Atwater versus Lago Vista, United States</p> <p>2 Supreme Court, and in the Fifth Circuit, Price</p> <p>3 versus Roark. If you need an example, I'll</p> <p>4 participate.</p> <p>5 MR. CLARKE: He's not right, because</p> <p>6 it's not a crime. But Atwater said you don't</p> <p>7 violate the Constitution, the Fourth Amendment, by</p> <p>8 arresting somebody even when state law says it's a</p> <p>9 nonarrestable offense. But we can -- we can have a</p> <p>10 theoretical discussion about things later on.</p> <p>11 MR. CLARKE CONTINUED:</p> <p>12 Q. But that's your training. Your training</p> <p>13 is, you can arrest anybody for a traffic ticket?</p> <p>14 MS. GRIFFITH: Object to the form.</p> <p>15 You can answer.</p> <p>16 THE WITNESS: Yes, sir.</p> <p>17 MR. CLARKE CONTINUED:</p> <p>18 Q. Okay. All right. Now, when you got out</p> <p>19 of the training academy, were you given a set of</p> <p>20 policies -- well, let me -- in the training</p> <p>21 academy, were you taught about report writing?</p> <p>22 A. Yes, sir.</p> <p>23 Q. And do they tell you when you're involved</p> <p>24 in an incident you're supposed to document?</p> <p>25 A. Yes, sir.</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. And when they said -- did they talk to you</p> <p>2 about events that required you to write a report?</p> <p>3 MS. GRIFFITH: Object to the form.</p> <p>4 You can answer.</p> <p>5 THE WITNESS: In the academy, it</p> <p>6 would be too generic. It's each policy and their</p> <p>7 procedure on when they're to be wrote. The two</p> <p>8 different departments here have two different</p> <p>9 policies.</p> <p>10 MR. CLARKE CONTINUED:</p> <p>11 Q. They just talk to you about -- okay. Now,</p> <p>12 let's talk about the county policy. When you got</p> <p>13 out, were you provided a copy of the policies?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Did you have take any kind of --</p> <p>16 A. Can I back up on that?</p> <p>17 Q. Yes.</p> <p>18 A. When I got out of the academy, I was not,</p> <p>19 because I was reserve.</p> <p>20 Q. When did you get a copy of -- did you ever</p> <p>21 get a copy of the county's policies?</p> <p>22 A. Yes, sir.</p> <p>23 Q. When did you get a copy of the county's</p> <p>24 policies?</p> <p>25 A. The first -- I signed for it. I don't --</p>

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<p>1 I don't recall the date.</p> <p>2 MR. CLARKE: Let me mark -- where we</p> <p>3 at? Exhibit No. 4.</p> <p>4 (EXHIBIT 4 WAS MARKED FOR THE RECORD.)</p> <p>5 MR. CLARKE CONTINUED:</p> <p>6 Q. What I've identified as Exhibit No. 4 is a</p> <p>7 copy of all documents that were produced by the</p> <p>8 county when I requested your personnel file. See</p> <p>9 if you can look at that.</p> <p>10 MS. GRIFFITH: I'm just taking a</p> <p>11 quick look if you don't mind.</p> <p>12 MR. CLARKE: That's fine.</p> <p>13 MR. CLARKE CONTINUED:</p> <p>14 Q. You can look at those documents. Do those</p> <p>15 documents tell you when you got the policy book?</p> <p>16 A. No, sir.</p> <p>17 Q. Was it after you became a part-time</p> <p>18 officer?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Did you take any tests pertaining to your</p> <p>21 knowledge of the policies?</p> <p>22 A. No, sir.</p> <p>23 Q. Did you have any actual classroom training</p> <p>24 on the policies?</p> <p>25 A. No, sir.</p>	<p>Page 42</p> <p>1 Q. When I was asking you questions, when we</p> <p>2 got onto this track, you said the city and the</p> <p>3 county have different requirements/policies with</p> <p>4 respect to when you write reports.</p> <p>5 A. Yes, sir.</p> <p>6 Q. Tell me what the -- when the county</p> <p>7 requires you to write a report pursuant to policy.</p> <p>8 A. Any call. Any call or contact. If</p> <p>9 someone comes to the sheriff's department, wants a</p> <p>10 report, you have to do a report. If you go and</p> <p>11 respond to a wreck on the interstate, which is</p> <p>12 highway patrol jurisdiction, you still have to do a</p> <p>13 report. If you -- any call, you're supposed to get</p> <p>14 the call number -- or the case number, time of call</p> <p>15 and time of arrival, and do a report, whether</p> <p>16 it's -- and there's no specific on how detailed it</p> <p>17 has to be.</p> <p>18 Q. Are you required under the county policy</p> <p>19 to write up a report when somebody is injured?</p> <p>20 A. Was there at that time, or is there now?</p> <p>21 Q. Okay. In December -- let's ask the</p> <p>22 question both ways. In December 23rd, 2016, did</p> <p>23 you have to write a report if somebody was injured?</p> <p>24 A. No, sir.</p> <p>25 Q. And after December 23rd, 2016 -- and I</p>
<p>1 think they enacted some new policies in March of</p> <p>2 2017. Do you have to write a report setting forth</p> <p>3 the circumstances when somebody is injured?</p> <p>4 A. I don't remember.</p> <p>5 Q. When you wrote your second incident</p> <p>6 report, which we don't -- I don't have a copy of,</p> <p>7 and I'll look for, did you note in that report that</p> <p>8 Mr. Worley had been injured?</p> <p>9 A. I did not in that incident report. I</p> <p>10 thought that I had done a narrative, but I don't</p> <p>11 think I can find it. In my mind, I thought I did a</p> <p>12 narrative on what had happened.</p> <p>13 Q. But since this lawsuit, you've never been</p> <p>14 able to find it?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. All right. Now --</p> <p>17 A. To the best of my knowledge. Unless I did</p> <p>18 find it and provided it.</p> <p>19 THE WITNESS: Do you remember?</p> <p>20 MS. GRIFFITH: I don't remember.</p> <p>21 THE WITNESS: I don't remember.</p> <p>22 MS. GRIFFITH: I don't remember</p> <p>23 seeing it.</p> <p>24 THE WITNESS: I don't remember. I</p> <p>25 recall looking for it, but I don't recall finding</p>	<p>Page 44</p> <p>1 it.</p> <p>2 MR. CLARKE CONTINUED:</p> <p>3 Q. Where would you look for it?</p> <p>4 A. I would look for it on my personal thumb</p> <p>5 drive and on the hard -- the computer that we had</p> <p>6 at the time crashed on us. It's -- I can show you</p> <p>7 where it's at. It's still sitting where they put</p> <p>8 it the day it crashed. That's where a lot of our</p> <p>9 stuff went.</p> <p>10 Now, I didn't always back up my thumb</p> <p>11 drive faithfully, daily. And I think that's where</p> <p>12 my narrative -- because I wanted to protect myself.</p> <p>13 Q. Okay. Why did you want to protect</p> <p>14 yourself?</p> <p>15 A. Because the totality of the circumstances.</p> <p>16 Q. Is it because of what Officer Griffin did?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Had you worked with Officer Griffin</p> <p>19 before?</p> <p>20 A. I think he came with another deputy and</p> <p>21 backed me up on someone who tried to run over me.</p> <p>22 And I got in a foot pursuit, and he rode with me</p> <p>23 from that arrest to the jail. But I can't think of</p> <p>24 any other time. Best of my memory, he didn't -- I</p> <p>25 don't like people riding with me.</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. Okay. And that was prior to the Worley 2 incident?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Did he mistreat that prisoner?</p> <p>5 MS. GRIFFITH: Object to the form.</p> <p>6 You can answer.</p> <p>7 THE WITNESS: Mistreat? No.</p> <p>8 MR. CLARKE CONTINUED:</p> <p>9 Q. Did he strike him?</p> <p>10 A. Yes, sir.</p> <p>11 Q. All right. Did you report that to the 12 sheriff?</p> <p>13 A. I don't know if I did or one of the 14 full-time officers did. I think the full-time 15 officer may have. I can't speak for them.</p> <p>16 Q. Okay.</p> <p>17 A. I did not.</p> <p>18 Q. Did the inmate or the person in custody 19 sustain injuries?</p> <p>20 A. No, sir.</p> <p>21 Q. What did he do -- what did Officer Griffin 22 do to the inmate or the suspect?</p> <p>23 A. In that case, he hit him.</p> <p>24 Q. Did he punch him in the face?</p> <p>25 A. Yes, sir. He was trying to bite several</p>	<p style="text-align: right;">Page 47</p> <p>1 of us. He was not cuffed.</p> <p>2 Q. Under the Grenada County policies, if you 3 see an officer strike somebody or mistreat 4 somebody, what are you supposed to do?</p> <p>5 A. We go back to, the part-time is 6 responsible for who is with them -- or the 7 full-time. That's why I did not want anybody 8 riding with me, because I didn't want to take 9 anybody -- be responsible for what someone may pull 10 on their own. He was not riding with me that day. 11 He only went to help with the transport.</p> <p>12 Q. Okay.</p> <p>13 A. Which was only about two blocks.</p> <p>14 Q. I thought he was in the car with you.</p> <p>15 A. He arrived to back me up when I requested 16 help. Everybody in the city and county came.</p> <p>17 Q. Okay. And I thought your testimony was 18 that he rode back with you to the jail.</p> <p>19 A. To the jail, about two blocks, yes, sir.</p> <p>20 Q. Who was the deputy who was with -- or the 21 supervisor or the --</p> <p>22 A. If I'm not mistaken, he arrived with Eric 23 Williamson.</p> <p>24 Q. Eric Williams?</p> <p>25 A. Williamson.</p>
<p style="text-align: right;">Page 48</p> <p>1 Q. Williamson. Okay. And where did the 2 officer -- or Deputy Griffin, where was the suspect 3 when he punched him?</p> <p>4 A. In a yard. In a yard. He was fighting 5 and trying to bite three or four of us at one time. 6 I was asking a city officer to tase him. We 7 couldn't get cuffs on him. In fact, he -- this 8 gentleman has been -- about two -- three years ago, 9 two years ago, went before our circuit judge. Went 10 crazy in front of him, and he has still not been 11 sent to Whitfield or anything yet.</p> <p>12 Q. You know the person's name?</p> <p>13 A. Aaron Williams.</p> <p>14 Q. Is the person that was arrested?</p> <p>15 A. Yes, sir. A-a-r-o-n Williams.</p> <p>16 Q. All right. So other than that event and 17 what happened in Worley, those are the only times 18 that you have been serving as a county deputy where 19 you were -- where you observed or worked with 20 Officer Griffin, correct?</p> <p>21 A. (No audible response.)</p> <p>22 Q. Or on a call together.</p> <p>23 A. On a call together. I've seen him -- you 24 know, we swap -- he usually come in after 4:00. I 25 left at 4:00.</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Right.</p> <p>2 A. I knew he was out there, and, you know, he 3 may have showed up with some people on different 4 calls. And I don't know that we -- well, I worked 5 with him on a -- he was on a search warrant with us 6 one night on a house.</p> <p>7 Q. All right. Did he strike anybody that 8 night?</p> <p>9 A. No, sir.</p> <p>10 Q. Have you worked with him since the Worley 11 incident?</p> <p>12 A. No, sir.</p> <p>13 Q. Do you know whether or not he's actively 14 serving as a deputy -- or reserve deputy for 15 Grenada County since the Worley incident?</p> <p>16 A. As far as I know, he hasn't.</p> <p>17 Q. Do you know whether or not that was 18 because the sheriff took him off the job after this?</p> <p>19 A. That's my understanding.</p> <p>20 Q. All right.</p> <p>21 (OFF THE RECORD.)</p> <p>22 MR. CLARKE CONTINUED:</p> <p>23 Q. Have you ever been disciplined with the 24 County of Grenada for any type of... .</p> <p>25 A. No, sir.</p>

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1 Q. With the City of Greenville --		
2 A. Grenada.		1 minute. . .
3 Q. City of Grenada, have you ever been		2 Q. Other than his typical what?
4 disciplined in your law enforcement capacity?		3 A. Squalling, crying. And the next second,
5 A. No, sir.		4 he's -- when he's drunk, he's crying one minute,
6 Q. Now, you knew Mr. Worley before the events		5 he's mean as he can be the next. It's just like
7 of December 23rd, 2016, didn't you?		6 this (indicating up and down).
8 A. Yes, sir.		7 Q. But you didn't have any problem arresting
9 Q. What did you know about Mr. Worley?		8 him, right?
10 A. That was either my third or fourth time to		9 A. No, sir.
11 arrest him.		10 Q. You just had to put up with him, right?
12 Q. And what did you arrest him for?		11 A. Yes, sir.
13 A. The first time I arrested him was on		12 Q. All right. When's the next time you
14 Thanksgiving Day the year prior. There was a		13 arrested him?
15 disturbance at his house with him and Ms. Kitchens.		14 A. Either one or two times -- one in
16 He was very intoxicated. And he just kept on. Of		15 particular I remember, we had an active warrant on
17 course, he was on his property. And he was told		16 him, and I was coming up a road, and I saw a car on
18 not to go to the road or he'd be arrested on public		17 the side of the road with the door open, in the
19 drunk, and he stumbled straight out there.		18 middle of the road.
20 Q. Is that when you arrested somebody else		19 And I went up and I ran the tag, and it
21 there at the property?		20 come back to Ms. Kitchens, and I realized then that
22 A. Yes, sir. Thomas Shane Lamb. Yes, sir.		21 Worley was in the area. She came out of the woods,
23 Q. What's the next time? So did you arrest		22 said they were digging worms to go fishing, out of
24 him without incident there?		23 the woods.
25 A. Other than his typical squalling one		24 I said, "Tell Richard to come on. I've
		25 got a warrant for him." He come on up there, put
1 his hands behind him. He was stone sober. No	Page 52	
2 problems.		1 the jail.
3 Q. What was the warrant for?		2 Q. All right. Now, what was the trouble?
4 A. I do not recall.		3 A. Drunk, mouthing, threatening. Vague
5 Q. What's the next time you arrested him?		4 threats. You get them all the time, you know.
6 A. I'm thinking there's another warrant in		5 Sometimes you just to have overlook it.
7 there somewhere.		6 Q. Well, you don't take any of the threats
8 Q. Okay.		7 seriously, do you, of Mr. Worley?
9 A. And it must not have been an incident -- I		8 A. You -- I have to disagree with that one.
10 can't remember if -- I'm not sure.		9 Q. Okay. But you arrested --
11 Q. All right. Did you have any problems		10 A. Up until the -- this date, I never took
12 arresting him at that time -- any of those times?		11 him seriously.
13 A. Negative. No, sir.		12 Q. All right. So it was just -- when you
14 Q. Okay. Now, tell me what happened on		13 went to the academy, they told you you're going to
15 December 23rd. You apparently had a --		14 have to deal with belligerent people, drunk people,
16 A. Well, can I back up on that? Can I --		15 jerks?
17 Q. Yeah.		16 A. De-escalate.
18 A. Had problems with him once we got him to		17 Q. And that's what you're supposed to do?
19 the jail. And I do not remember which one we had		18 A. Yes, sir.
20 more problem out of, either him or Thomas Shane		19 Q. Did you go to verbal judo classes?
21 Lamb. Maybe Randy Sweat can answer that, if he		20 A. Yes, sir.
22 remembers it. Because it was me and him on the		21 Q. All right. And when somebody's like that,
23 call, two separate trucks and two separate arrests,		22 you've got time on your side, you just let them --
24 two separate transports. We got to jail, and there		23 you back up and de-escalate, correct?
25 was trouble out of one of them or both of them at		24 A. Yes, sir.
		25 Q. All right. He never threw a punch at you,

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<p>1 tried to bite you or anything in any of those --</p> <p>2 you know, we're talking about prior to December</p> <p>3 23rd, 2016. Correct?</p> <p>4 A. I do not recall what happened on</p> <p>5 Thanksgiving Day at the jail. That's my only</p> <p>6 problem with answering that question.</p> <p>7 Q. Well, this is my opportunity to find out</p> <p>8 what you're going to testify to in this case.</p> <p>9 A. I can't testify to anything because I</p> <p>10 can't remember it. I just know there was an</p> <p>11 incident.</p> <p>12 Q. Did he try to bite you?</p> <p>13 A. Not that I'm aware of that day, no, sir.</p> <p>14 Q. Did he throw a punch at you?</p> <p>15 A. He was cuffed. And somebody like that,</p> <p>16 that's that way, we swap the cuffs out. We don't</p> <p>17 completely take them off if we see there's a risk.</p> <p>18 On my arrests. I can't speak for everybody else.</p> <p>19 Q. I understand. There's no -- there's no</p> <p>20 policy that you're aware of that requires how you</p> <p>21 handle prisoners or suspects from the county?</p> <p>22 A. No, sir.</p> <p>23 MS. GRIFFITH: Object to the form.</p> <p>24 Are you talking about policies pre-2016 or --</p> <p>25 MR. CLARKE: I'm talking about</p>	<p>1 policies that applied to his arrests before</p> <p>2 December 23rd, 2016.</p> <p>3 MS. GRIFFITH: You can answer if you</p> <p>4 know.</p> <p>5 THE WITNESS: I do not recall any</p> <p>6 written policies on how we hand them off.</p> <p>7 MR. CLARKE CONTINUED:</p> <p>8 Q. Is there some kind of custom that you</p> <p>9 follow?</p> <p>10 A. My custom is, I don't take the cuffs off.</p> <p>11 I'll stand there and listen to the mouths until the</p> <p>12 jail takes over, get the things they need, do their</p> <p>13 little search, get their cuffs on, get my cuffs</p> <p>14 off. And then I ask them if they're okay. And</p> <p>15 once they say they're okay, then I leave.</p> <p>16 Q. All right. So let's talk about December</p> <p>17 23rd, 2016. Apparently, based on the first</p> <p>18 incident report -- or the incident report that we</p> <p>19 marked as Exhibit No. 1, you went to a call at</p> <p>20 Barbara -- I think it was Barbara Kitchens'</p> <p>21 mother's house.</p> <p>22 A. Yes, sir.</p> <p>23 Q. And do you know Barbara Kitchens?</p> <p>24 A. I do, yes, sir.</p> <p>25 Q. Are you kin to her somehow?</p>
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<p>1 A. No, sir.</p> <p>2 THE WITNESS: Did you put him up to</p> <p>3 that?</p> <p>4 MS. GRIFFITH: No, I did not.</p> <p>5 MR. CLARKE CONTINUED:</p> <p>6 Q. Is somebody married to somebody, you got a</p> <p>7 nephew or something that's a Kitchens?</p> <p>8 A. Did she tell you that again?</p> <p>9 Q. Yeah.</p> <p>10 A. Does she really believe that? No, sir.</p> <p>11 Q. Okay.</p> <p>12 A. See, there we go again.</p> <p>13 Q. I don't know anything. But you're not --</p> <p>14 you're not kin, don't have a nephew, don't have</p> <p>15 anything that's kin to Barbara Kitchens?</p> <p>16 A. No, sir.</p> <p>17 Q. Okay. All right.</p> <p>18 A. You didn't ask me that about Mr. Worley.</p> <p>19 I'm wondering where that come from. Because</p> <p>20 actually there was a situation with her in court</p> <p>21 where she said that. She said her niece was my --</p> <p>22 no, her -- her niece was my uncle, I believe is the</p> <p>23 way she kept saying it.</p> <p>24 Q. Okay. All right. Well, but that's not --</p> <p>25 whatever it is, you don't have any kinship.</p>	<p>1 A. No, sir.</p> <p>2 Q. Through marriage or blood or anything.</p> <p>3 A. No, sir.</p> <p>4 Q. Okay. But you ended up going to the</p> <p>5 mother's house. Tell me what you observed when you</p> <p>6 got there.</p> <p>7 A. I got there, and he was mouthing, very</p> <p>8 drunk. They wanted him off the property. Barbara</p> <p>9 was driving, very apologetic. One minute he was</p> <p>10 screaming and hollering, one minute he was loving</p> <p>11 the world, one minute he was screaming and</p> <p>12 hollering.</p> <p>13 It was right at Christmas. Here we go</p> <p>14 with another holiday. "I don't want to do this,</p> <p>15 Richard. Go home." I sat there and said, "Go</p> <p>16 home. Please go home so I don't have to do</p> <p>17 anything right here at the holidays again."</p> <p>18 He would be loud, he'd be quiet, he'd be</p> <p>19 loud. And the mother-in-law -- or Barbara's mother</p> <p>20 -- I'm not sure if Worley and her are married. I</p> <p>21 think they've just lived together so long. But</p> <p>22 it's her mother's house. They were adamant he</p> <p>23 wasn't staying there. Barbara promised me she</p> <p>24 would take him straight home.</p> <p>25 Q. And apparently that didn't happen. At</p>

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**1 some point, based on the radio traffic we had, you
2 were responding to some kind of call and then
3 encountered them, correct?**

4 A. No, sir. I went to that call, told her to
5 take him straight home. Do not stop, go straight
6 home. If I saw them out, I was -- he had to go to
7 jail, because I couldn't take a chance on him --
8 any more disturbances, period.

9 I spent a little -- Tim, SO-12, Tim
10 Gholston, we met there at the -- somewhere in the
11 neighborhood, and I rode through the neighborhood
12 looking for somebody I had a warrant on. I look
13 for people with warrants every day I'm out. I
14 maintain the warrant list.

15 So I made a few loops through the
16 neighborhood, and it was getting late. You know,
17 it was dusk, little bit before dusk. And the
18 levee's two and a half miles long. And when I
19 approached the end of the levee going south, I saw
20 Barbara's car coming towards me. And it turned and
21 went down towards the spillway.

22 Well, when it did, it went down by the
23 spillway and pulled up in front of the bathhouse.
24 And I said: Okay. He's got to use the restroom.
25 I'm not going to say he's got to go straight home.

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1 drunk as he was.
2 And, you know, I'd heard rumors about his
3 history and how he gets, and I've seen him, you
4 know. Usually I can de-escalate, but I'd rather
5 have somebody there with me. I'm a -- I'm a pretty
6 independent person, but when I figure something may
7 go wrong, I don't hesitate to call for backup.

8 Tim gets down there, and a few minutes
9 later, he starts stumbling back towards the car.
10 So I told him, I said, "Richard, you need to go
11 home. I've given you more than enough chance. I
12 don't want to take you for public drunk." And he
13 told me he was going fishing. I said, "No, sir. I
14 don't have any choice."

15 And he turned and went towards -- at the
16 front of the car, and I met him. When I did, he
17 run around to the side -- or the best he could, run
18 to the side of the car. And I grabbed one arm, got
19 the cuffs on him, then me and Tim had to get the
20 other one. He resisted on us.

21 And we took him to the back passenger side
22 of my patrol truck. And when we got him to the
23 door and up in the seat, he was hollering and
24 carrying on, slob- -- you know, he was just being
25 Richard drunk.

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1 If he's got to use the restroom, let him go use it
2 instead of doing it in the vehicle, in my mind.

3 Q. Right.

4 A. So I pulled up, and he went -- got out of
5 the passenger seat. Tried to open -- stumbled,
6 tried to open the back door and couldn't get it to
7 open. And he looked at me, and I pointed to the
8 bathroom. He looked back down and tried to open
9 the door again, and looked back at me, and I
10 pointed. You know, "Please, Richard, go to the
11 bathroom." I'm in my truck.

12 Q. Right.

13 A. Well, he stumbled -- and it's a pretty
14 good distance. It's from here to -- pretty close
15 to the trees from where you park to the front of
16 the restroom. And he stumbled up there. And I
17 told Barbara, I said, "Barbara, I told you to take
18 him home." I said, "If you don't take him home, I
19 have no option. He's got to go with us."

20 She said, "He made me stop and get some
21 beer, and he said he's going fishing."

22 And apparently he had his fishing gear and
23 beer in the back seat. So I called for Tim. I
24 asked if he was close, and he said he was. I said,
25 "Come on down here. It may go bad," especially as

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1 He got up there, and I'm not sure if he
2 tried to headbutt me or what he had done, but it
3 was obvious he wasn't going to sit in the back seat
4 of that truck. And he -- I held the door the best
5 I could with him -- he had attempted to kick it,
6 and either hit me in the head with his head or the
7 door.

8 I told Tim, I said, "Go around the other
9 side and let's drag him in." And I held the door.
10 And he was steadily trying to kick the door and
11 butt his head against it.

12 Tim drug him in, shut the door. By this
13 time, I think all the city -- you know, once I
14 started transporting, he -- we go back to the same
15 thing. I never believe anybody, but I believed him
16 that day. He threatened to kill me and my family,
17 burn our house down, and he made it clear he knew
18 where I lived. So I called for backup at the jail.

19 Q. Okay. Let's break this down a little bit.

**20 Sometime throughout this, you said you'd heard
21 rumors about Mr. Worley.**

22 A. In law enforcement, if you -- I've got
23 several people I can -- I can give you a list of
24 names right now, and you can go ask other law
25 enforcement, and they know you use caution with

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1 them. Because --	1 A. And he's a -- and I was told he was a
2 COURT REPORTER: Use -- I'm sorry?	2 convicted felon.
3 THE WITNESS: Use caution with them.	3 Q. All right. Who told you these things?
4 Because they've got a history of wanting to resist,	4 A. I couldn't start to tell you.
5 or wanting to hit, or wanting to bite, or wanting	5 Q. Just kind of stuff around?
6 to... .	6 A. You sit there and eat lunch every day with
7 MR. CLARKE CONTINUED:	7 different people in the law enforcement world, and
8 Q. I understand what a rumor is.	8 it's a daily thing, and -- "Well, we had an
9 A. Right, a rumor. But it's a rumor to	9 incident with Richard Worley."
10 protect us.	10 "Well, you better watch him, you know.
11 Q. I understand. What were the rumors that	11 He's -- don't ever let your guard down around him."
12 you heard?	12 Q. You'd arrested him two or three times
13 A. I've heard he's bit a man's ear off. I	13 before, and --
14 heard he'll headbutt you in a heartbeat. I know	14 A. Either two or three.
15 for a fact he's a drunk, you know, or -- and/or	15 Q. And none of those rumors panned out?
16 drugs. He's lost so much weight now, I believe he	16 A. Not up to that point, no, sir.
17 is, or was, doing both. I've never caught him with	17 Q. So you had your own personal knowledge of
18 drugs on him.	18 him being a loud, belligerent drunk, but --
19 Q. So you heard rumors that he's -- he bit	19 A. Yes, sir.
20 somebody's ear off?	20 Q. -- not being violent, correct?
21 A. Yes, sir.	21 A. Yes, sir. Or resisting, up until the
22 Q. What are the other rumors you heard?	22 point he was going to go fishing.
23 A. He can -- he can hurt a man. In a	23 Q. All right. Did he try to run away from
24 heartbeat.	24 you?
25 Q. Have you ever --	25 A. He was either trying to run away or get
1 into the back passenger seat. When he cut that	1 my head.
2 way, I couldn't tell you what his intent was.	2 Q. Did you see him try to bite you?
3 Q. All right. But you --	3 A. I didn't see him bite, but when he -- you
4 A. But I told him to stop, that he was under	4 know, when you come at somebody with your head,
5 arrest, and he just -- that's when... .	5 you're handcuffed, and you hear the rumors, it's
6 Q. It's your testimony here today that you	6 just -- it's there: I've got to protect myself.
7 got a handcuff on him, and then Tim Gholston -- is	7 Q. Okay. Where were you? Were you outside
8 it --	8 the car?
9 A. Gholston.	9 A. I was outside the truck, yes, sir.
10 Q. Gholston --	10 Q. I mean, how was he going to headbutt you
11 A. Had to assist me with that.	11 if he's in the car?
12 Q. Had to assist, and you got the handcuffs	12 A. You reach across and put the seatbelt on
13 on him.	13 or reach across to give the other deputy the
14 A. Yes, sir.	14 seatbelt to fasten for you, you're putting yourself
15 Q. And then he resisted getting into the --	15 in danger.
16 getting into the car?	16 Q. Were you doing that? I thought you said
17 A. In the truck, yes, sir.	17 you couldn't get his seatbelt on.
18 Q. In the truck. You were in a marked truck,	18 A. I didn't attempt to, no, sir.
19 right?	19 Q. So you didn't have yourself inside the car
20 A. Yes, sir.	20 to get headbutted, correct?
21 Q. And you're saying -- did you put a	21 A. No, sir. I was not doing it.
22 seatbelt on him?	22 Q. Okay. So anything that he did, you were
23 A. I couldn't. He was just -- it was at the	23 not in danger from it?
24 point there was a safety issue with me, and him	24 MS. GRIFFITH: Object to the form.
25 wanting to headbutt or bite. It was in the back of	25 You can answer. Not sure I understand.

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<p style="text-align: right;">Page 66</p> <p>1 MR. CLARKE CONTINUED:</p> <p>2 Q. It's my understanding, you said you had 3 trouble getting him into the car. Correct?</p> <p>4 A. Yes, sir. In the truck, yes, sir.</p> <p>5 Q. All right. Did he try to headbutt when 6 you were standing up with him?</p> <p>7 A. I wasn't real clear if he was trying to 8 headbutt me or -- he went towards me. Now, whether 9 it was towards the door or not -- because after we 10 got him contained, he was butting his head against 11 the back door.</p> <p>12 Q. Okay. I'm trying to --</p> <p>13 A. He lunged.</p> <p>14 Q. Okay. I'm trying to --</p> <p>15 A. In my opinion, it was at me. I'm sorry, I 16 overspoke.</p> <p>17 Q. When you put him -- when he was standing 18 up before you attempted to put him in the car, did 19 he try to headbutt you?</p> <p>20 A. No, sir.</p> <p>21 Q. Okay. When you were getting him in the 22 car, I think you said you had Gholston go around 23 the other side to help pull him in?</p> <p>24 A. I had him go to the other side because 25 that's when he lunged, as I was setting him in</p>	<p style="text-align: right;">Page 67</p> <p>1 there.</p> <p>2 Q. Were you setting him in there --</p> <p>3 A. The truck sits. . .</p> <p>4 Q. Okay. When you're -- how do you put him 5 in? Do you put his head in first? Is that the way 6 -- isn't that the way you were trained?</p> <p>7 A. No, sir. The truck sits pretty high, so 8 you don't have to watch -- they typically step up. 9 And a lot of them that are handcuffed, the truck 10 sits off the ground, you have to physically help 11 them into it. It's not like a car.</p> <p>12 Q. Are you physically helping him from his 13 backside or from his front side?</p> <p>14 A. From his side. I mean, he has -- he gets 15 in, and I typically have one arm that I'm helping 16 -- because they can't use the hand rest up there.</p> <p>17 Q. Right. I got you.</p> <p>18 A. In his situation. If I don't feel 19 threatened and there's no threats or anything, I'll 20 handcuff them in front a lot of times. That's my 21 -- you know, it's just a lot more comfortable on 22 them. But after he resisted, and then us having to 23 drag him to the truck, he was handcuffed in the 24 back.</p> <p>25 And he was -- as he was getting in, of</p>
<p style="text-align: right;">Page 68</p> <p>1 course, he's facing me at that point, because he's 2 resting his backside on the seat. So he didn't 3 just get in and plop down facing forward. At that 4 point is when he lunged at me with his head.</p> <p>5 Q. Okay. So if I understand this correctly, 6 he didn't try to headbutt you when you were 7 standing up before you put him in, correct?</p> <p>8 A. No, sir.</p> <p>9 Q. Okay. And then to help him get in, he's 10 got to turn kind of sideways, and you help push him 11 up by, I guess --</p> <p>12 A. By holding his arm.</p> <p>13 Q. -- his left side?</p> <p>14 A. Right side. I'm on the back passenger 15 side.</p> <p>16 Q. Okay. So you help push him up. And then 17 how was he seated once you -- once you first 18 attempt to push them up? Because you're pushing 19 him sideways, correct?</p> <p>20 A. You're trying to help him in sideways, but 21 they turn towards you.</p> <p>22 Q. Okay.</p> <p>23 A. Their arm is going to end up at the back 24 of the door, at the outer part of the seat, because 25 they're sitting. Instead of stepping straight up,</p>	<p style="text-align: right;">Page 69</p> <p>1 scooting over, and then sitting down as one motion, 2 their backside comes in, then they swing their -- 3 typically swing their feet around. In that case, 4 he didn't swing his feet around.</p> <p>5 Q. Did you have to push his feet in?</p> <p>6 A. I attempted to, and it didn't work.</p> <p>7 That's why -- one of the reasons Tim went to the 8 other side. I couldn't close the door because of 9 his actions.</p> <p>10 Q. Okay.</p> <p>11 A. But I had it -- it wasn't slammed on him. 12 It was held until we could contain him from the 13 other side and pull him in.</p> <p>14 Q. So did Mr. Gholston -- Officer Gholston 15 then grab him by some part of his upper body and 16 kind of pull him in?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Get his feet in the car?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Is there a cage or a partition between the 21 front seat and the back seat of your truck?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. So after he's sitting up there, 24 after you help him try to get up and while his feet 25 are not pushed to the front -- or in front of him</p>

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1 in the seat, that's when you say he tried to	
2 headbutt you?	1 A. Yes, sir.
3 A. In the process of him sitting down, and me	2 Q. His legs are still not in the truck,
4 helping him get on in, is when he lunged at me with	3 correct?
5 his head. Now, what his intentions were, I really	4 A. Yes, sir.
6 can't tell you. In my opinion, he was trying to	5 Q. You're outside.
7 headbutt me.	6 A. Yes, sir.
8 Q. And if he does that, you can't punch him,	7 Q. Is it your testimony that he could have
9 right?	8 come down and hit you with his head and headbutted
10 MS. GRIFFITH: Object to the form.	9 you when you were in that position?
11 You can answer.	10 A. Yes, sir.
12 MR. CLARKE CONTINUED:	11 Q. All right. And then you closed the door
13 Q. I mean, at that point, he couldn't	12 at some point, or --
14 actually hit you, could he?	13 A. I attempted to.
15 A. He could cause more injury headbutting me	14 Q. And his feet --
16 than he could with his fist, in my opinion. He	15 A. But to keep him from kicking me or -- I'm
17 would never get close enough with his fist to me, I	16 sorry, I interrupted you. Finish your question.
18 hope.	17 Q. Right. I mean, as his feet didn't go in,
19 Q. He was handcuffed, so --	18 did he kick you?
20 A. Yes, sir.	19 A. No, sir.
21 Q. -- that wasn't going to happen. He's	20 Q. And it appears that to protect yourself,
22 sitting up in the -- he's sitting up in the car,	21 you closed the door and kind of held it to where
23 correct?	22 you would be safe. Correct?
24 A. Yes, sir. In the truck.	23 A. Yes, sir.
25 Q. His butt is on the seat.	24 Q. All right. And then Deputy Gholston got
	25 in and pulled him to where his feet would be in the
Page 72	Page 73
1 car and you could close the truck?	1 getting back up -- getting on the radio and back up
2 A. Yes, sir.	2 to the jail.
3 Q. Okay. All right. Now, as you -- after	3 Q. Did you call in to radio?
4 that happened, did you talk to Gholston about what	4 A. Yes, sir.
5 was happening? Did you ask him to come with you to	5 Q. And we should -- that should be taped,
6 the jail?	6 right?
7 A. I think it was automatic. It's time to go	7 A. Yes, sir.
8 -- at that point, it's time to go, and. . .	8 Q. Did you get on your telephone at any time
9 Q. There's no dilly-dally when that --	9 or your way from the levee back to the jail?
10 A. No, sir.	10 A. No, sir.
11 Q. Okay.	11 Q. What's your cell phone number?
12 A. Especially when someone's in that	12 A. 310-6450.
13 condition.	13 Q. Is that 662?
14 Q. Okay. So didn't see any injuries on him	14 A. Yes, sir.
15 at that time, correct?	15 Q. Who is your carrier?
16 A. No, sir.	16 A. C Spire.
17 Q. Now, do you go immediately from there to	17 Q. C Spire?
18 the jail?	18 A. Yes, sir.
19 A. Yes, sir.	19 Q. Was that the same carrier in December of
20 Q. Okay. Did you have any conversation with	20 2016?
21 Mr. Worley from the time you left there until you	21 A. Yes, sir.
22 got to the jail?	22 Q. So it's your testimony that you never
23 A. With him directly? Not to my memory, no,	23 spoke to anybody on your cell phone from the time
24 sir. He was -- he was pretty belligerent, loud,	24 you picked up Mr. Worley until the time you got to
25 and making the threats. I was more interested in	25 the jail?

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<p>1 A. To the best of my knowledge, yes, sir,</p> <p>2 because I'm not a telephone person. They're out</p> <p>3 there right now, because I just -- I hate them.</p> <p>4 Q. No problem. All right. So he's just</p> <p>5 acting the same kind of belligerent during the trip</p> <p>6 back to jail, correct?</p> <p>7 A. He was the worst I've seen him. I felt</p> <p>8 threatened. I felt threatened for my family.</p> <p>9 Q. Okay. And even if he threatened your</p> <p>10 family, that wouldn't give you the authority to</p> <p>11 punch him, would it?</p> <p>12 A. No, sir.</p> <p>13 Q. Now, when -- tell me what happened when he</p> <p>14 got to the jail.</p> <p>15 A. Got to the jail, I pulled my truck up</p> <p>16 through the left-hand side of the bay.</p> <p>17 Q. Was anybody in the sally port when you</p> <p>18 pulled up?</p> <p>19 A. I think there may have been a couple of</p> <p>20 trustees out there. The bay was extremely wet. It</p> <p>21 was either the condensation -- there was a -- I</p> <p>22 think it said "Slippery When Wet." But either they</p> <p>23 had just washed it, or it was condensation because</p> <p>24 of that time of the year.</p> <p>25 They were in there or were leaving out at</p>	<p>1 the time, because I remember seeing Sweat and Bull</p> <p>2 still inside. And then when I pulled up here, Tim</p> <p>3 Gholston pulled up here, on this side of me, which</p> <p>4 left a gap a little less than a door can fully</p> <p>5 open.</p> <p>6 Q. In between the two cars?</p> <p>7 A. In between the two trucks, yes, sir.</p> <p>8 Q. Between your truck and Gholston's truck?</p> <p>9 A. Yes, sir.</p> <p>10 Q. And other -- do you remember the names of</p> <p>11 the trustees?</p> <p>12 A. No, sir. I don't know -- no, I'm not on a</p> <p>13 first name -- I'm not on a first name basis with</p> <p>14 them. I speak to them all the time. And it's</p> <p>15 different ones all the time there.</p> <p>16 Q. Do you know --</p> <p>17 A. Once they're in that status, they're not</p> <p>18 going to be there long.</p> <p>19 Q. Do you know who they -- do you know how to</p> <p>20 identify who the trustees were?</p> <p>21 A. No, sir. No, sir. I've seen so many over</p> <p>22 the years.</p> <p>23 Q. I understand. But when you got in, was</p> <p>24 Officer -- or Deputy Sweat and Deputy -- you call</p> <p>25 him Bull?</p>
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<p>1 A. Bull, yes, sir.</p> <p>2 Q. Were they already in the sally port?</p> <p>3 A. They were in the sally port or standing</p> <p>4 there at the door of the sally port. I remember</p> <p>5 seeing them on this side of me as I went in. As</p> <p>6 far as in, out, or standing at -- which side of the</p> <p>7 door that opens, I do not recall.</p> <p>8 Q. Okay. And when you come to the sally</p> <p>9 port, do you have to -- do you have some kind of</p> <p>10 thing to open it up, or do you dispatch in to have</p> <p>11 it opened?</p> <p>12 A. The control tower opens it. Of course,</p> <p>13 they were aware I was coming, so they were watching</p> <p>14 the cameras for me.</p> <p>15 Q. Okay. So when you pulled up there, the</p> <p>16 door opened?</p> <p>17 A. The door opened on that side, yes, sir.</p> <p>18 Q. Do they close it when you get in?</p> <p>19 A. Yes, sir. And when --</p> <p>20 Q. So when -- I'm sorry.</p> <p>21 A. I'm sorry.</p> <p>22 Q. That's my fault. That's on me. Go ahead.</p> <p>23 A. They -- well, they -- before I take</p> <p>24 anybody out, I make sure the back door's closed,</p> <p>25 because there's no fenced-in area. The front door</p>	<p>1 a lot of times would stay open. That particular</p> <p>2 night, it was closed.</p> <p>3 Q. Okay.</p> <p>4 A. But there's a fence out there where nobody</p> <p>5 can get away from us.</p> <p>6 Q. Okay. Do you have to do something to</p> <p>7 physically close the door once you get in?</p> <p>8 A. No, sir.</p> <p>9 Q. That's done by the control people?</p> <p>10 A. Yes, sir.</p> <p>11 Q. All right. Now -- so before you attempted</p> <p>12 to get off -- Mr. Worley out of the car, was the</p> <p>13 sally port closed?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Now, take me through what you did after --</p> <p>16 did you get out of your car before the sally port</p> <p>17 closed?</p> <p>18 A. I do not remember if it was fully closed</p> <p>19 when I opened my door.</p> <p>20 Q. Okay.</p> <p>21 A. I'm not sure if it was when I stepped out</p> <p>22 or not. I know he was still secure.</p> <p>23 Q. Okay. But you didn't attempt to start</p> <p>24 getting him out until the door was closed?</p> <p>25 A. I never attempted to get him out. I</p>

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<p>1 didn't have a chance.</p> <p>2 Q. Tell me what -- tell me what you did.</p> <p>3 A. I got there, opened my door. Like I said, 4 Officer Gholston pulled up beside us. My windows 5 are -- well, all of them are. That's my truck. 6 You can see how dark that tint is. Those are even 7 darker.</p> <p>8 If I'm not mistaken, it's done got on 9 after dark. I think the lights were on in there. 10 And it was almost dark out. It's like -- I think 11 it was dark at that point. I'm not -- I don't 12 remember the time of the day. But it was in late 13 afternoon. I know I remember ER, it was bad late. 14 I know it was bad late.</p> <p>15 Anyhow, I get out. And I typically secure 16 my weapon on my front floorboard of the truck. 17 Close the door, and I go around to the front of it. 18 When I got to the front, the back door was open.</p> <p>19 Q. Okay. So were they getting him out the 20 passenger side door?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Okay. And who did you see was getting him 23 out?</p> <p>24 A. When I first got there, I couldn't tell 25 who was at the door. I just knew it was open.</p>	<p>Page 78</p> <p>1 Q. What did you see or hear next?</p> <p>2 A. When I got to the door and it was open, it 3 appeared that Bull had hit him or was in the 4 process of hitting him.</p> <p>5 Q. All right. And why do you say that?</p> <p>6 A. That's the way it looked to me. That's my 7 thought, is: He's hit him.</p> <p>8 Q. Did you see blood?</p> <p>9 A. I don't remember seeing -- if I did or 10 not. I don't remember at that point.</p> <p>11 Q. Where was Deputy Sweat?</p> <p>12 A. At the back of the truck close to the bay 13 door.</p> <p>14 Q. All right. So did you ask Officer Bull to 15 come help you?</p> <p>16 A. I asked for backup on the way. Now, did I 17 ask him to open my door? I didn't ask for anybody. 18 I mean, if I'm there to back somebody up, I'll 19 typically go on and make contact to hopefully, if 20 there's something escalated, it can be de-escalated.</p> <p>21 Q. Based on your knowledge of Officer -- 22 Deputy Bull, was he the de-escalator?</p> <p>23 MS. GRIFFITH: Object to the form.</p> <p>24 You can answer.</p> <p>25 THE WITNESS: It didn't appear he</p>
<p>Page 80</p> <p>1 was, no, sir.</p> <p>2 MR. CLARKE CONTINUED:</p> <p>3 Q. When you -- so you get out of your car. 4 By the time you -- were you going over to the 5 passenger side to assist with getting Worley out?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Where were you when you saw Officer Bull 8 with Mr. Worley with the door open?</p> <p>9 A. I was at the door. There's an opening 10 that you could see through. The door's open, then 11 you got the open spot, and you see into the back 12 seat.</p> <p>13 Q. All right. And where did -- you know, you 14 said it appeared he was hitting him or --</p> <p>15 A. Or had hit him or had -- was in the 16 process of swinging at him.</p> <p>17 Q. Just describe -- I mean --</p> <p>18 A. It just -- it happened so quick, and I 19 hollered, "Bull" -- I don't remember the phrase. I 20 either told him, "Don't do that," or "Stop. Let's 21 get him inside."</p> <p>22 Q. All right.</p> <p>23 A. And he yanks him out.</p> <p>24 Q. Right. So did you see Mr. Worley do 25 anything?</p>	<p>Page 81</p> <p>1 A. I did not, no, sir.</p> <p>2 Q. So based on everything that you observed, 3 was it an improper strike by Officer -- Deputy 4 Bull?</p> <p>5 MS. GRIFFITH: Object to the form.</p> <p>6 MS. RILEY: Objection to form.</p> <p>7 MR. CLARKE CONTINUED:</p> <p>8 Q. You can answer.</p> <p>9 A. I've never been in that position. I don't 10 know -- it's -- and I've had difficulty answering 11 this with you. I just . . .</p> <p>12 Q. You don't -- you don't -- you can't -- 13 well, let me rephrase my question.</p> <p>14 A. Okay.</p> <p>15 Q. You were trained, correct?</p> <p>16 A. Yes, sir.</p> <p>17 Q. You were trained that you can only use 18 that amount of force that is necessary to protect 19 yourself, correct?</p> <p>20 A. Yes, sir.</p> <p>21 Q. You were trained that if somebody cusses 22 you out or threatens you, that doesn't allow you to 23 punch him unless you are in imminent, immediate 24 danger of injury to yourself, correct?</p> <p>25 A. Yes, sir.</p>

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<p style="text-align: right;">Page 82</p> <p>1 Q. So anything that Mr. Worley says when he's 2 handcuffed, that would not justify anybody striking 3 him under your training, correct? 4 A. If -- anything that he said. 5 Q. Right. 6 A. Now, if he tried to bite him or headbutt, 7 I wasn't there. 8 Q. Well, you were there. 9 A. Well, I couldn't see. I -- 10 MS. GRIFFITH: Object to the form. 11 MR. CLARKE CONTINUED: 12 Q. You were in the sally port, correct? 13 A. I was in the sally port, yes, sir. 14 Q. When you told Officer -- or Deputy Bull to 15 stop, that was, you didn't want him to continue to 16 assault Mr. Worley, correct? 17 MS. RILEY: Objection to the form. 18 MS. GRIFFITH: Object to the form. 19 THE WITNESS: Does that mean I answer? 20 MR. CLARKE CONTINUED: 21 Q. Yes. 22 MS. GRIFFITH: You can answer. 23 THE WITNESS: Okay. Okay. I'm used 24 to you saying, "You can answer." 25 MS. GRIFFITH: I'm sorry.</p>	<p style="text-align: right;">Page 83</p> <p>1 THE WITNESS: Well, you used the word 2 "assault." 3 MR. CLARKE CONTINUED: 4 Q. Punching somebody in the face. 5 A. The incident that led up to it that I 6 could not see, was not there to see, whether he 7 tried -- attempted to bite him, headbutt him, I 8 don't know. I don't know what led up to that. I 9 saw what appeared to be Bull swinging at him one 10 time. 11 Q. All right. Where was Mr. Worley? Was he 12 still in the car? 13 A. In the truck, yes, sir. 14 Q. In the truck. I'm sorry. 15 A. Yes, sir. 16 Q. Was Mr. Worley facing Deputy Bull? Were 17 his legs turned? 18 A. That was outside of my view. I couldn't 19 tell where his legs was at. The door was still 20 open. I was on the other side. 21 Q. You were looking in between the crack? 22 A. I was looking at which was the upper body, 23 and I -- all I could tell, it looked like they were 24 face to face. Now, whether the rest of his body 25 was or not... .</p>
<p style="text-align: right;">Page 84</p> <p>1 Q. Could you see Mr. Worley's face? 2 A. Yes, sir. Dimly. 3 Q. Excuse me? 4 A. Dimly, because of the windows and the 5 lighting in the bay. 6 Q. Was there any blood on his face? 7 A. I do not remember at that point. 8 Q. All right. Why did you say to Deputy 9 Bull, "Stop"? 10 A. Because in my opinion, at that point, we 11 had -- he either needed to back out and let some of 12 us -- we had enough manpower there to get him out. 13 Q. Did he stop? 14 A. Yes. 15 Q. All right. And then what happened? 16 A. That's when I told him to "Stop" or "Quit" 17 or "Don't do this." "Let's get him inside." He 18 got him out. Still at a disadvantage to me. 19 Q. Who got him out? 20 A. Bull. 21 Q. So he didn't stop. 22 A. No, he got him out. He didn't swing on 23 him anymore. 24 Q. Okay. 25 A. He got him out of the truck. And about</p>	<p style="text-align: right;">Page 85</p> <p>1 the time they got to the back of the truck -- 2 there's a drain, a big metal drain there. In that 3 area, they hit the ground. That's about the time I 4 got the door shut. 5 Once I got it shut, they were already -- 6 you know, it's just a couple of feet to the back of 7 the truck. They were at the back of it, and I saw 8 them fall. And whether Bull fell on top of him or 9 not, I don't remember. I remember bodies hitting 10 the ground. 11 Q. You saw Mr. Worley on the ground? 12 A. Yes, sir. 13 Q. You saw Deputy Bull on the ground? 14 A. I'm -- the best of my memory, both of them 15 hit the ground. 16 Q. Did you see Mr. Worley at any time try to 17 run away from any of the officers? 18 A. I did not. 19 Q. And when Officer Bull got him out of the 20 car, he walked -- he went with Mr. Worley towards 21 the back of the truck, correct? 22 A. It appeared that way. Still, I've got a 23 door in between me and them. 24 Q. Were you around the front of the truck? 25 A. I was coming around the front. The door</p>

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<p style="text-align: right;">Page 86</p> <p>1 was open. They were -- the door opens this way. 2 They walked to the back. 3 Q. Okay. So you couldn't see Officer -- 4 Deputy Bull's arms swinging when he was taking him 5 out of the truck? 6 MS. GRIFFITH: Object to the form. 7 MS. RILEY: Objection to the form. 8 MR. CLARKE CONTINUED: 9 Q. I misunderstood. I thought you came 10 around the back of the truck. 11 A. No, sir. I came around the front. 12 Q. So you came around he front of the truck. 13 A. There's -- the door's open. Doesn't open 14 fully because -- 15 Q. Gholston -- 16 A. -- Gholston's truck's there. So I've got 17 a door in between me with tinted windows. The 18 lighting's not the best in the bay. I saw what I 19 thought was Bull swinging one time -- one time -- 20 at Worley. At that point, I told him, "Stop. 21 Let's get him inside." 22 Q. And then after he pulled him -- after he 23 got him out, you closed the door? 24 A. Yes, sir. 25 Q. And then you saw them --</p>	<p style="text-align: right;">Page 87</p> <p>1 A. When it closed is when I saw them hitting 2 the ground. 3 Q. And that was both of them, Worley and Bull? 4 A. To the best of my memory, yes, sir. 5 Q. All right. Did you attempt to get Bull 6 away from Worley at that point? 7 A. No, sir. At that point, I thought they 8 both just slipped on the wet floor. I remember 9 Sweat and a couple of jailers being back there, one 10 or two, I'm not sure. One of them was a female, 11 Ms. Evans, is the only one I really remember. I'm 12 not sure where Gholston went or -- at that point, I 13 walked in. I remember them -- somebody picking him 14 up. And I walked in and walked straight through 15 the booking area to the control tower. 16 Q. All right. So when you told Bull to stop 17 and you saw them on the ground, you didn't do 18 anything to get Officer Bull away from Mr. Worley? 19 MS. GRIFFITH: Object to the form. 20 MR. CLARKE CONTINUED: 21 Q. Correct? 22 A. At that point, I -- it was my judgment 23 that they had slipped and fell. There wasn't a 24 ruckus going on. The only thing I saw was the one 25 swing. And what was said or done that led up to</p>
<p style="text-align: right;">Page 88</p> <p>1 that, I don't know. I assumed, which is a bad word 2 to use, that one or both of them fell and hit the 3 bay floor. I knew Worley did, and I think both of 4 them did, and I thought it was because of the 5 slippery surface. 6 Q. Well, when you yelled "Stop" to Bull, were 7 you wanting Bull to not be involved with Mr. Worley 8 anymore? 9 A. I didn't want him to hit him. 10 Q. But you got -- you had de-escalation 11 training, right? 12 A. Yes, sir. 13 Q. You had a number of other officers that 14 were there, right? 15 A. Yes, sir. 16 Q. You could have said, "Get the hell out of 17 there, Bull. Let somebody else take him," right? 18 A. I wasn't sure who was close enough to get 19 in there to get to him. I remember myself, and I 20 do not remember if Tim was in -- had gotten out of 21 his truck yet or if he was on the other side. I 22 don't remember where everybody was at. And I 23 couldn't get to him, and the door was open. 24 Q. But you didn't say that? You didn't say, 25 "Bull, get away from him"?</p>	<p style="text-align: right;">Page 89</p> <p>1 MS. GRIFFITH: Object to the form. 2 You can answer. 3 THE WITNESS: I didn't say that 4 specifically, no, sir. 5 MR. CLARKE CONTINUED: 6 Q. And you didn't do anything to get him away 7 from Mr. Worley? 8 MS. GRIFFITH: Object to the form. 9 MS. RILEY: Object to the form. 10 MS. GRIFFITH: You can answer. 11 THE WITNESS: Physically, I couldn't. 12 Verbally, I could have said, "Just step away. Stay 13 away." 14 MR. CLARKE CONTINUED: 15 Q. I'm -- you know, this is my deposition of 16 you to -- 17 A. Yes, sir. 18 Q. -- find out what you're going to testify 19 to at trial. 20 A. I'm going to testify that there's a door 21 in between me. Physically, I couldn't do anything. 22 Q. But then you closed the door when -- 23 A. At that point, they were on the -- they 24 were going to the ground or on the -- so close to 25 the ground, it was unreal.</p>

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<p style="text-align: right;">Page 90</p> <p>1 Q. And you were close enough that you're -- 2 you're the bed of a pickup truck away from them? 3 A. Yes, sir. 4 Q. Where did you go next? I know you said 5 you went into the sally port and then went to the 6 control room. 7 A. I went straight to the control room. 8 Q. How did you go? Did you go around the 9 back of the truck or the front of the truck? 10 A. Like I say, I couldn't -- I don't remember 11 if it was jailers, Sweat; Sweat, Tim, who was 12 picking Worley and/or Bull up. At that point, I'd 13 felt threatened on the way up there. It just -- 14 that's the only time that someone -- I believed 15 what they said they were going to do. 16 So I was -- this was going through my 17 head, and then I didn't agree with what I thought I 18 saw with the one swing. So at that point, there 19 was enough people there to contain him. I had to 20 go and separate myself in the control tower. 21 Q. All right. You understood that there -- 22 you give somebody to somebody else who's not 23 invested in it, correct? 24 MS. GRIFFITH: Object to the form. 25 MS. RILEY: Objection to the form.</p>	<p style="text-align: right;">Page 91</p> <p>1 MR. CLARKE CONTINUED: 2 Q. When you had -- when you had training, the 3 -- in de-escalation training, if there's somebody 4 else who's not involved in the situation, one of 5 the things that you can do is allow somebody who's 6 not invested in the situation to handle it, correct? 7 MS. RILEY: Objection to the form. 8 MS. GRIFFITH: Object to the form. 9 THE WITNESS: And I think you're 10 saying the same thing I did. I -- I -- I stayed 11 away because I was mentally upset, and I couldn't 12 de-escalate at the time. There was other officers 13 and jailers there. 14 MR. CLARKE CONTINUED: 15 Q. But there was also one officer there that 16 you left -- you went to de-escalate yourself. 17 A. Yes, sir. 18 Q. Okay. And you left him with somebody who -- 19 A. With the -- 20 Q. With the person who you felt, based on 21 what you observed, struck him, correct? 22 A. Yes, sir. 23 Q. And hopefully the other people might could 24 have been involved. You were doing what you had to 25 do for your safety, right?</p>
<p style="text-align: right;">Page 92</p> <p>1 A. Yes, sir. 2 Q. Okay. So do you go around the back of the 3 truck or the front of the truck when you go in -- 4 A. I went through the back. They were at a 5 angle at the back of the truck. And the way the 6 trucks came in, the backs were further apart than 7 the fronts. And I went away, but I went away -- I 8 wasn't there -- I wasn't able to de-escalate at 9 that point. But he was also -- Sweat was there, 10 who he was working with, who was. . . . 11 Q. I understand. 12 A. Okay. 13 Q. You were doing what you had to do for 14 yourself, and there were other officers there who 15 were going to handle Mr. Worley? 16 A. Yes, sir. 17 Q. And if they went through the same training 18 that you did, they would want to de-escalate it 19 too, correct? 20 A. (No audible response.) 21 Q. I'll just withdraw that question. That's 22 a bad question. 23 So you go in through the sally port, the 24 doors to the jail, and you go right to the control 25 room. Is that correct?</p>	<p style="text-align: right;">Page 93</p> <p>1 A. Yes, sir. 2 Q. Is the control room where they have 3 cameras? 4 A. Yes, sir. 5 Q. Did you ask them to make a copy of the 6 tape? 7 A. I did not. 8 Q. Why not? 9 A. I was talking to the lady controlling 10 everything about what they saw wasn't me, that's 11 not how I handle business. 12 Q. I understand. 13 A. In my mind, there was a recorder. And if 14 you want me to expound on that, I will. 15 Q. Yeah, sure. 16 A. As that went on, we end up -- I take him 17 to the emergency room myself. By myself. 18 Q. Okay. I just want to talk about the tape 19 part. 20 A. Okay, the tape. All right. I'm getting 21 to that. We get back, I instantly call Josh Dale, 22 chief investigator -- 23 Q. Who? 24 A. Josh Dale, chief -- one of our 25 investigators -- we've got two -- and the sheriff,</p>

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1 and I think Eric Williamson, at that point from the 2 house, asking them for -- to get a copy of it. 3 Because I wanted it. 4 Q. You wanted to protect yourself? 5 A. Yes, sir. 6 Q. And if Bull did something wrong, to have 7 him -- 8 A. Yes, sir. 9 Q. -- account for it, right? 10 A. Yes, sir. 11 Q. So after you got back from the hospital, 12 you told that to the sheriff, one of your 13 investigators, and who else? 14 A. I think I called all three of them. I 15 think. 16 Q. Give me the names again. I'm sorry. 17 Strider? 18 A. Strider, Josh Dale, and Eric Williamson. 19 Q. Okay. 20 A. Best of my memory, I talked to all three 21 of them. 22 Q. Okay. Now, the report that you filled out 23 for the arrest that we don't seem to have a copy of 24 right here, did you note in that report that Deputy 25 Bull punched him?	1 A. I wouldn't know unless I got to see it 2 again. I'm not sure what was put in there. 3 Q. All right. Should it be in there if 4 you're writing an incident report of what happened 5 during the arrest? 6 A. In the arrest report? I'm thinking on an 7 arrest report, I put what his charges were, simple 8 arrest report with his charges. There was no major 9 narrative. And I thought that I had done a 10 separate narrative pertaining to it. 11 Q. To the incident with Officer Bull? 12 A. The whole incident. 13 Q. Okay. 14 A. Just for me, and to cover the events and 15 the -- but I can't -- as far as I know, I have not 16 been able to put my hands on where it was saved at, 17 if it was on that computer or my thumb drive. I 18 don't think I used that. 19 Q. Okay. 20 A. Because I couldn't find it. 21 Q. Well, if you find something like that, 22 just make sure you give it to your attorney. I 23 mean... . 24 A. Yes, sir. 25 Q. When you spoke to the sheriff, did the
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1 sheriff ask you to write out everything that you 2 saw? 3 A. To the best of my knowledge, he did. To 4 the best of my memory, he did, and that's why I 5 done it. 6 Q. Did you turn that in to him? 7 A. I'm not sure what happened to it. 8 Q. Did you give a copy of that report to the 9 investigator? 10 A. I'm not sure what happened to it. 11 Q. Was it a handwritten report? A typed 12 report? 13 A. No, sir. I'm a little OCD as far as 14 reports. I'll handwrite something just to get -- 15 you know, get to where I can get to a computer and 16 sit there and get my thoughts and type it up and go 17 replace it. I'm not sure. 18 Q. You're probably like me, can't read your 19 own handwriting. 20 A. That's right. Nobody can. 21 Q. All right. So let's talk about when you 22 got in -- the control room's close to the booking 23 area, correct? 24 A. Yes, sir. 25 Q. And did you see that -- did you see how	1 Mr. Worley got into -- from the sally port into the 2 jail area, the booking area? 3 A. No, sir. 4 Q. Did you see Mr. Worley or any of the -- 5 who was in the jail area when you -- who was inside 6 that you could see when you got into the jail from 7 the sally port? 8 A. To the best of my memory and knowledge, I 9 remember -- well, I'm not sure where they were 10 standing. I remember Bull, Sweat, Gholston, and 11 one or two jailers. 12 Q. Hankins? Do you know a Hankins? 13 A. (Shakes head negatively.) 14 Q. Does that ring a bell? Do you know who 15 Linda Evans is? 16 A. Linda Evans was in the control tower with 17 me. 18 Q. She was in the control tower? 19 A. With me. 20 Q. Was anybody at the booking desk? 21 A. I'm not sure who was at the booking desk. 22 Q. Well, do you know if there was even 23 somebody at the booking desk? 24 A. Best of my knowledge, there was. 25 Q. All right. White? Black?

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<p style="text-align: right;">Page 98</p> <p>1 A. I mean, was I wrong? Was a different 2 jailer in there? You've got me thinking. But I'm 3 -- I've said all along, I was apologizing. That it 4 wasn't me. That's not the way I act. To Ms. Evans. 5 Q. Well, Ms. Evans, is she an employee? 6 A. She's a jailer. Yes, sir. 7 Q. Okay. Who normally is doing booking? 8 A. (Shrugging.) 9 Q. It could be anybody? 10 A. Yes, sir. They swap out more than the 11 inmates do. 12 Q. Okay. Did you ask to review the tape in 13 your -- 14 A. I did not, no, sir. 15 Q. Did you tell them, the people there, to 16 save that tape? 17 A. No, sir. 18 Q. Did you ever see a tape after the events? 19 A. No, sir. I was told it didn't work. 20 Q. And who told you that? 21 A. I think it was Josh Dale. The best of my 22 memory, Josh Dale's the one that said the 23 recorder's tore up. 24 Q. Who is Josh Dale? 25 A. Investigator.</p>	<p style="text-align: right;">Page 99</p> <p>1 Q. All right. Did you see anything -- did 2 you see anybody once Mr. Worley got inside? That's 3 a bad question. I'm sorry. I might as well go 4 back to Greenville. 5 Once you got in, you went to the control 6 center. And we have a kind of map that was drawn 7 out by another witness, Exhibit No. 1 to Bibbs. 8 She says the sally port door is over here to the 9 right side of the drawing. That there's a booking 10 desk, and that the control center is -- does that 11 look where the control center is? 12 A. Yes, sir. 13 Q. Can you see from the control center out 14 into the booking area? 15 A. This counter -- 16 Q. Yeah. 17 A. It comes to about -- or did come to about 18 right here. I think they've changed it now. 19 Q. Okay. 20 A. It came to about right here. 21 MR. GRIFFITH: Don't write on that. 22 MR. CLARKE CONTINUED: 23 Q. Up to your... 24 MR. GRIFFITH: Over my head. 25 MS. GRIFFITH: How tall are you?</p>
<p style="text-align: right;">Page 100</p> <p>1 THE WITNESS: I'm five nine. So I 2 comfortably laid my arms on it. So it's not a low 3 -- it's up (indicating chest height). 4 MR. CLARKE CONTINUED: 5 Q. And while you were in the control center, 6 I think you saw Gholston, you saw Sweat, you saw 7 Bull, and some inmates? Who did you see once you 8 were in the control center? 9 A. I don't know if the inmates were out there 10 or out here -- in here. There was a couple inmates 11 there when I walked out. I remember them standing 12 right in there. 13 MS. GRIFFITH: And just so the record 14 reflects, are you pointing to the booking area? 15 THE WITNESS: Oh, to the -- to the -- 16 MR. CLARKE CONTINUED: 17 Q. The area where you come in from the sally 18 port? 19 A. From the sally port -- between the sally 20 port and the counter. 21 Q. Okay. 22 A. Which, a lot of times if they're out or 23 something's going on, those trustees know, if they 24 don't want to get involved, they want to get to a 25 neutral area usually.</p>	<p style="text-align: right;">Page 101</p> <p>1 Q. Go to the corner. All right. And did you 2 ever see Nurse Bibbs come out of the medical 3 center? The medical room. 4 A. I do not remember -- well, I saw her, but 5 I don't remember at what point I saw her. I don't 6 know at what point she come out -- or if she did, 7 to be honest with you. I remember seeing her when 8 I went to get him to take him to the ER. That's 9 the only time I remember, in my mind, seeing her. 10 I don't know what her actions were -- 11 Q. Okay. Did you see -- 12 A. -- anywhere. 13 Q. Okay. From the time that Mr. Worley got 14 into the jail, into the -- I'm going to call this 15 the "booking area," from the sally port to the 16 booking desk. Okay? 17 A. Countertop. Yes, sir. 18 Q. Okay. Did you see Mr. Worley move or be 19 taken from the sally port through the booking area? 20 A. They came in behind me, whoever brought 21 him in. I know they were here. I remember -- 22 Q. When you say "here," that's the booking 23 desk? 24 A. In front of the booking desk. 25 Q. Okay.</p>

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<p style="text-align: right;">Page 102</p> <p>1 A. I remember seeing Sweat in this -- I 2 thought in this area right here. Now, the only 3 time I actually saw Worley in that area -- not even 4 in that area -- was, past this counter somewhere, 5 to the best of my memory, Sweat was pulling him to 6 the nurse's station.</p> <p>7 Q. And was he on the ground?</p> <p>8 A. He was on the ground, yes, sir. If I'm 9 not mistaken, he was pulling him by his shirt.</p> <p>10 Q. Do you know how he got to the ground?</p> <p>11 A. No, sir.</p> <p>12 Q. You didn't see Officer Bull strike him again?</p> <p>13 A. No, sir.</p> <p>14 MS. GRIFFITH: Object to the form.</p> <p>15 MR. CLARKE CONTINUED:</p> <p>16 Q. Did you see any other officer strike him?</p> <p>17 A. No, sir.</p> <p>18 Q. All right. So after that happens, when is the next time you see Mr. Worley after you go to the control center?</p> <p>19 A. Not sure of the time period there. He was 20 going here --</p> <p>21 Q. "Here" being medical?</p> <p>22 A. -- from somewhere in the booking area</p>	<p style="text-align: right;">Page 103</p> <p>1 behind this counter. From my view, obstructed view 2 of the counter, going from that booking area to the 3 nurse's station. And at some point they said he's 4 got to go to the ER.</p> <p>5 Q. But you saw him being dragged across the 6 floor to the nurse's station?</p> <p>7 A. To the best of my memory, yes, sir.</p> <p>8 Q. Okay. And when they said he had to go to 9 the hospital, was he your -- was that your 10 responsibility?</p> <p>11 A. And here we go into the de-escalation. I 12 felt like it was at that point. Because I've never 13 had a physical altercation with him, as long as 14 somebody was there to help me get him loaded up.</p> <p>15 Q. Okay. Well, he was your prisoner, correct?</p> <p>16 A. Well, there's a fine line on what point he 17 becomes the jail's. You know, in my opinion, once 18 we get in that -- that door goes down behind me, 19 where's the fine line of he's from mine to the 20 jail's custody, other than when they take the cuffs 21 off of him and I say goodbye? At what point 22 legally is he theirs, mine? It's a common ground. 23 I'm not sure. I took him in, yes. I arrested him 24 and I put the charges on him.</p> <p>25 Q. He's still -- and what charges did you put</p>
<p style="text-align: right;">Page 104</p> <p>1 on him?</p> <p>2 A. (No audible response.)</p> <p>3 Q. Here's a booking sheet, if that helps you.</p> <p>4 A. It's going to be disorderly conduct, 5 public drunk, and -- resisting arrest, disorderly 6 conduct, public drunk.</p> <p>7 Q. What were the -- resisting arrest, what were the factual bases for resisting arrest that formed the basis of you bringing that charge against him?</p> <p>8 A. When I told him he was under arrest, he 9 was going to jail for disorderly conduct -- or 10 public drunk, and he stumbled around the other side 11 of the car, and I tried to get one cuff on him and 12 couldn't get the other one on, and Gholston tried 13 to help me get him --</p> <p>14 Q. You didn't put any charge on him for anything that he may or may not have done to Deputy Bull, did you?</p> <p>15 A. No, sir.</p> <p>16 Q. Did you ever talk to Deputy Bull after these events about what happened?</p> <p>17 A. The two of us just haven't, in our 18 careers, had a lot of conversation. I'm -- have we 19 spoke about it?</p>	<p style="text-align: right;">Page 105</p> <p>1 Q. Yeah.</p> <p>2 A. He'll ask me -- a couple of times, he's 3 asked me in passing what have I heard, wants to 4 know when he can come back. You know, I said, 5 "That's not up to me. That's up to the attorneys 6 and the sheriff," you know.</p> <p>7 Q. Well, did he ever apologize to you about what he did?</p> <p>8 A. Not that I remember.</p> <p>9 Q. All right. So at some point, you're -- who tells you that he's got to go to the -- well, when did you see any injuries on Mr. Worley, if any?</p> <p>10 A. Don't know that I actually saw anything 11 until they said he had to go and I went around the 12 corner to get him.</p> <p>13 Q. Okay. Did you ask anybody how he ended up on the ground by the booking desk?</p> <p>14 A. I did not, because I don't know how he got 15 in there, on his own free will or if he was drug in 16 there, if he went in and slipped and fell, or if 17 they pushed him or what. I don't know. They were 18 behind me, and I went straight to the control room.</p> <p>19 Q. Okay. That's just what you saw. So when you went there, did you talk to the nurse, when you</p>

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<p style="text-align: right;">Page 106</p> <p>1 went -- after you were informed that he needed to 2 go to the hospital?</p> <p>3 A. I do not remember which one told me he had 4 to go. I think it was Ms. Evans or one of the 5 other jailers come in and said he's got to go to 6 the ER.</p> <p>7 Q. It wasn't the nurse?</p> <p>8 A. I don't remember having a conversation 9 with her at all.</p> <p>10 Q. Did you get him out of the nurse's station?</p> <p>11 A. I think that's where I went to get him. 12 And I asked him was he -- I was there to help him. 13 Did he -- because of his injury of his fall in the 14 bay. Was he going to be okay, or was he going to 15 act up if I took him.</p> <p>16 Q. Well, you don't know if got injured when 17 he slipped in the bay or whether he --</p> <p>18 A. I assumed that.</p> <p>19 Q. -- was injured when -- well, you also saw 20 him get punched, right?</p> <p>21 A. Yes, sir. But the injury -- where the 22 injury was at.</p> <p>23 Q. Where was the injury?</p> <p>24 A. Under the chin.</p> <p>25 Q. All right.</p>	<p style="text-align: right;">Page 107</p> <p>1 A. And I said I saw what appeared to be Bull 2 swing at him. Now, whether or not he made contact, 3 I'm not 100 percent sure because of the conditions.</p> <p>4 Q. Okay. Well, I thought I asked you did you 5 see blood when --</p> <p>6 A. You asked me if I saw blood, and I said I 7 don't remember seeing any blood.</p> <p>8 Q. So you didn't see any when they were on 9 the ground, right?</p> <p>10 A. No, sir. Because when I went by, I went 11 by and straight in.</p> <p>12 Q. Did you see any in the booking area where 13 you saw him on the ground?</p> <p>14 A. I didn't see him on the ground in the 15 booking area. I saw blood when I went to get him 16 and take him out.</p> <p>17 Q. Where did you see the blood?</p> <p>18 A. The blood was leading to the nurse's 19 station from the booking area and out into the bay.</p> <p>20 Q. All right. You take him -- how did you 21 get him -- did you take him in your car to the 22 hospital?</p> <p>23 A. Took him in the truck. Same truck, same 24 place in the truck, back passenger side. To the ER.</p> <p>25 Q. All right. Did anybody go with you or</p>
<p style="text-align: right;">Page 108</p> <p>1 ride with you?</p> <p>2 A. No, sir.</p> <p>3 Q. Did anybody meet you there?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Who met you there?</p> <p>6 A. Sweat and Bull. I told Sweat, "Take him 7 away."</p> <p>8 Q. Take who --</p> <p>9 A. "All you're" --</p> <p>10 Q. Take Bull away.</p> <p>11 A. Take Bull away. "I do not need an 12 escalation in here."</p> <p>13 Q. Did you have any problems getting him in 14 the truck or getting him out of the truck to the 15 doctor?</p> <p>16 A. No, sir.</p> <p>17 Q. All right.</p> <p>18 A. Other than mouthing.</p> <p>19 Q. Was he saying they got -- he was beat up?</p> <p>20 A. He was saying a good bit. He was using 21 pretty good language.</p> <p>22 Q. Was he saying he was -- he got his ass 23 kicked?</p> <p>24 A. Oh, he said, "I got -- I took a country 25 ass whooping," is what he said. He said that</p>	<p style="text-align: right;">Page 109</p> <p>1 multiple times.</p> <p>2 Q. All right. And did you stay at the 3 hospital until he was done with his treatment?</p> <p>4 A. I did.</p> <p>5 Q. Did Sweat and Bull?</p> <p>6 A. No, sir. Just Sweat.</p> <p>7 Q. Well, Bull was riding with Sweat.</p> <p>8 A. When they got there.</p> <p>9 Q. All right. Did Bull take the car -- take 10 the car, then?</p> <p>11 A. Best of my knowledge, he shouldn't have. 12 Because Sweat didn't leave with me. Sweat's truck 13 was there. So I don't know what arrangements Sweat 14 made to get him away from the ER.</p> <p>15 Q. Okay.</p> <p>16 A. That'll be him to answer.</p> <p>17 Q. After you brought him -- after you brought 18 him -- after he had his treatment, did you bring 19 him back to the jail?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Did you book him there?</p> <p>22 A. He had already been booked. All I had to 23 do was drop him off.</p> <p>24 Q. It's your testimony that he was booked -- 25 he was booked before he went to the hospital?</p>

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<p style="text-align: right;">Page 110</p> <p>1 A. I'm not sure -- that is not my testimony. 2 At what point they actually booked him in, no, sir. 3 Q. Well, what do you -- 4 A. Because I didn't do the booking. I didn't 5 watch them. 6 Q. Well, what do you do when you book 7 somebody? 8 A. They sit there and they ask questions and 9 -- I'm not sure. I'm not trained in it. 10 Q. It's your testimony that you stay there 11 until they swap out the handcuffs, right? 12 A. Right. But does that mean they've been 13 booked all the way? No. I don't know what the 14 process is. 15 Q. You don't know whether they fingerprint 16 people when they book them or take their pictures? 17 A. Sometimes they take pictures. Sometimes 18 they don't. 19 Q. Okay. 20 A. It's according to what the situation. In 21 a situation like that, they typically don't. They 22 wait until everything is calmed down and sober up, 23 and they'll take a picture before they leave if our 24 camera's working. 25 Q. Well, there wasn't any time -- you didn't</p>	<p style="text-align: right;">Page 111</p> <p>1 see Mr. Worley being sat down or any pictures being 2 taken prior to you taking him to the hospital, did 3 you? 4 A. I did not. I can reasonably say that it 5 wasn't done until everything calmed down, based 6 upon experience. 7 Q. And when you bought him back in, did you 8 swap out your handcuffs? 9 A. I do not remember if they were still mine 10 or they had already swapped out at that point. Do 11 not remember at what point they were actually 12 swapped out. 13 Q. What did you do -- just tell me what 14 happened when you brought him back and when you 15 went back on duty or went off duty. 16 A. I don't -- I remember bringing him back, 17 dropping him off. I remember I was well overdue to 18 be home, and I went straight home and made some 19 phone calls. 20 Q. Did you call people about this incident? 21 A. That's what I told you. I called -- to 22 the best of my memory, I called those three people 23 about it. 24 Q. Did you ever -- 25 A. Because I wanted to be sure that it</p>
<p style="text-align: right;">Page 112</p> <p>1 wasn't... 2 Q. You didn't want to get in trouble for what 3 happened? 4 A. Right. Because that's not me. 5 Q. Okay. After these events, did you ever 6 have any discussions about this incident with 7 Mr. Gholston or Mr. Sweat? 8 A. We've had discussions, yes, sir. I mean, 9 we've had -- we've met with them, Ms. -- 10 Q. I don't want to -- anything you talked to 11 your lawyer about, I don't want to know about. I'm 12 talking about -- you talked a lot before about you 13 know certain things from talking to officers about 14 people, right? 15 A. (No audible response.) 16 Q. Did you talk -- do you have -- you know, 17 talk over lunch about what happened and what people 18 saw or what happened? 19 A. Specific conversations, I don't recall. 20 It's reasonable to assume, yes, it did. And that's 21 part of our process of helping us cope with stress. 22 Q. Did Sweat tell you anything about any 23 issues he had with Bull? 24 A. He didn't say anything about -- I have 25 never heard him say anything -- any instances about</p>	<p style="text-align: right;">Page 113</p> <p>1 Bull. 2 MR. CLARKE: That's all I have. 3 MS. GRIFFITH: I need to take a 4 break. 5 (OFF THE RECORD.) 6 MR. CLARKE CONTINUED: 7 Q. What was Deputy Bull wearing? What was he 8 dressed like? 9 A. No clue. 10 Q. No clue? Were there any Greenville 11 officers inside the booking area? 12 A. There wasn't any Greenville or Grenada. 13 No, sir, there wasn't any Grenada. 14 Q. And, look, I apologize. 15 A. No, there wasn't any Grenada officers. 16 Q. Okay. No city officers? 17 A. No, sir. 18 Q. Did you see anybody in there -- do you 19 know whether or not -- well, what is the normal 20 uniform? What were you wearing that day? 21 A. Most likely black. I can't say. I've got 22 three different uniforms. 23 Q. Well, tell me the three different uniforms 24 you have. 25 A. Three different uniforms. I've got a</p>

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<p style="text-align: right;">Page 114</p> <p>1 issue shirt, short sleeve, which is gray and black. 2 Q. All right. And when you wear that -- 3 A. And I wear the badge with it and a name 4 tag, and I wear motorcycle wings here because I'm 5 on the motor unit for both. I've got black cargo 6 pants. I've got dark blue issued pants with a 7 stripe down them. 8 Q. Are these all county? 9 A. All county. Actually, that's the only 10 variations then. There's a third one where I 11 ordered everybody new shirts on the part-time and 12 reserve, and we didn't get them until June of last 13 year. So there was only two, the shirt, which is 14 gray short sleeve, and the two separate pants. 15 Q. What other kind of shirts can you wear 16 when you're a county officer? 17 A. At that date? The reserves aren't issued 18 anything, so it's whatever they buy. 19 Q. So when you're a reserve, you don't have 20 an official Grenada police uniform? 21 A. Typically, no. There's exceptions to that. 22 Q. Do you know -- so you can't tell me 23 whether -- I mean, if you can think of, when Bull 24 fell down with Mr. Worley, was he wearing dark 25 clothes? light clothes? He wouldn't have a</p>	<p style="text-align: right;">Page 115</p> <p>1 sheriff's deputy shirt, correct? 2 A. Not a gray one, no, sir. 3 Q. Okay. So it couldn't be that. If you can 4 picture that, tell me, was he wearing a dark shirt? 5 a light shirt? 6 A. I'd be guessing. 7 Q. Do you know what kind of shoes he was 8 wearing? 9 A. No, sir. 10 MR. CLARKE: Okay. That's all. 11 MS. GRIFFITH: I have a few 12 questions. 13 EXAMINATION 14 BY MS. GRIFFITH: 15 Q. Do you know what kind of shoes Mr. Worley 16 was wearing that day? 17 A. From the incident in the truck, best of my 18 knowledge, it was a pair of boots similar to what 19 I'm wearing now. 20 Q. So would those boots have had, do you 21 think, a slick sole? 22 A. These do. These are just normal work 23 boots made out of leather with the slick sole on 24 the bottom. Well, this ain't even slick. 25 MR. CLARKE: That's not slick.</p>
<p style="text-align: right;">Page 116</p> <p>1 THE WITNESS: No, these are not 2 slick. I'm not sure what kind of sole he had. 3 MS. GRIFFITH CONTINUED: 4 Q. I'm going to hand you Exhibit 3 to 5 Worley's deposition -- this is the UMC medical 6 records -- and direct you to the top of page 2. 7 And it says "Review of Symptoms. Reason unable to 8 perform ROS: Patient is intoxicated and very 9 noncooperative." Why would there be a hospital 10 note such as that? 11 MR. CLARKE: Object to the form. 12 MS. GRIFFITH CONTINUED: 13 Q. You can answer. 14 A. Because of his highs and lows and him 15 using the language he was using. He refused -- 16 when they stitched him, he refused -- he made it 17 clear, no one was going to -- going to use a needle 18 to deaden any pain. He was going to take it like a 19 man. And he took it like a man. 20 Q. So do you think he was so drunk that he 21 just didn't feel the pain? 22 A. I've been in the medical field most of my 23 Army career, and either the intoxication or some 24 other substance, yes. Because a normal human 25 being, in my opinion, can't take it like he took</p>	<p style="text-align: right;">Page 117</p> <p>1 it. I was hurting just watching. 2 Q. About how many stitches do you think he 3 had to have? 4 A. The number eight keeps ringing up in my 5 head. I'm not sure the exact number. 6 Q. So you said he was using all sorts of 7 language. And I hate to ask you to do that, but 8 could you tell me what sort of language he was -- 9 what sort of things he was saying? 10 A. He used the N word several times, "That 11 N," he said, "whooped my ass." He even said he 12 knocked his teeth out, but I don't remember any 13 teeth being knocked out. 14 Q. So you didn't see any -- 15 A. Was there anything in the -- the only 16 injury I knew that was treated was this (indicating 17 chin), and they x-rayed it several times, the best 18 of my memory. Or -- and they were real slow about 19 what they were doing because of the way he was 20 treating the hospital staff. 21 Q. Do you think the hospital staff felt 22 threatened? 23 A. I did. Even though we were there, they 24 were very cautious. 25 Q. Did you see any evidence that he had a</p>

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<p style="text-align: right;">Page 118</p> <p>1 tooth knocked out?</p> <p>2 A. No, ma'am.</p> <p>3 Q. If someone testified that you could not smell alcohol on his breath, would that be a true statement?</p> <p>6 A. No, ma'am. You're saying that somebody else testified they didn't smell alcohol?</p> <p>8 Q. Yes. And they had been in close proximity to him.</p> <p>10 A. Unless they had some bad sinus problems, no, ma'am.</p> <p>12 Q. If Mr. Worley testified that he only had two glasses of wine prior to you picking him up, would you believe that?</p> <p>15 A. Did he say what size glasses? You know, I --</p> <p>17 Q. He did not.</p> <p>18 A. I mean, seriously, he was -- he was bad. And two after how much of what other alcohol? He was highly intoxicated.</p> <p>21 Q. Did you go to the justice court and fill out an affidavit against him for threatening you and your family?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Did you ever see Nurse Bibbs dragging him</p>	<p style="text-align: right;">Page 119</p> <p>1 to her medical office?</p> <p>2 A. No, ma'am.</p> <p>3 Q. But you saw Randy Sweat dragging him in that direction?</p> <p>5 A. Best of my memory, it was Randy Sweat.</p> <p>6 Q. Where you were in -- I believe you said it was the control tower. Is that correct?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Could you see Worley in the booking area from where you were in the control tower?</p> <p>11 A. No, ma'am. The height of the bench, countertop, whatever -- I remember seeing Sweat. But apparently he was on the floor. For what reason, I don't know. I don't know if they brought him in, he wouldn't come in, they drug him in. I'm not sure of why he was on the floor. I never saw him here. I saw him when he passed here.</p> <p>18 Q. Meaning when Mr. Sweat was dragging him to medical. Is that correct?</p> <p>20 A. Best of my memory, Sweat was the one that drug him to the nurse's station.</p> <p>22 Q. So it's my understanding from your testimony earlier that you felt like after you saw him fall down in the sally port, that there were other trained officers there who were fully capable</p>
<p style="text-align: right;">Page 120</p> <p>1 of getting him into the booking area. Is that correct?</p> <p>3 A. Yes, ma'am. The jail staff. Officer Gholston was in the sally port. Randy Sweat was in the sally port.</p> <p>6 Q. Was Donny Willis working this day, to your knowledge, for the SO?</p> <p>8 A. Not to my knowledge.</p> <p>9 Q. Did you see him in the sally port or in the booking area?</p> <p>11 A. Do not recall seeing him the whole day, nor the sally port or the booking area.</p> <p>13 Q. So when Bull was trying to get Worley out of your truck, do you know if Worley was trying to kick Bull?</p> <p>16 A. I do not, because of the obstructive view of the door.</p> <p>18 Q. Do you know if Worley was trying to bite Bull?</p> <p>20 A. I do not because of where I -- from the time Worley got there, until the time I got my gun secured on the front floorboard, until the time I come around, the door was open, and I had an obstructed view.</p> <p>25 Q. So when you were out at the levee and</p>	<p style="text-align: right;">Page 121</p> <p>1 placing him under arrest, is it your testimony that he tried to run from you?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. And when you told him to stop, did he stop?</p> <p>6 A. No, ma'am. I was a little bit quicker than him.</p> <p>8 Q. Well -- and if Worley came in and testified that he was absolutely, equivocally, not drunk on this 12/23/16 date, what would you say to that?</p> <p>12 A. He perjured himself if he done it under oath. And I would say I'm pretty sure he wouldn't even let them draw blood that day, and that may be why. Did they draw blood?</p> <p>16 Q. I can't answer your questions.</p> <p>17 A. Okay. All right.</p> <p>18 Q. But it's your testimony -- are you saying that you did not see them draw blood in the hospital?</p> <p>21 A. I didn't.</p> <p>22 Q. Do you think he refused?</p> <p>23 A. I remember him refusing the shots. Best of my knowledge, he refused anything other than the stitching.</p>

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<p style="text-align: right;">Page 122</p> <p>1 Q. Do you know if Worley was ever accused of 2 beating Barbara Kitchens?</p> <p>3 A. Not firsthand knowledge. I think I've 4 read a report that that was the accusa- -- yes. It 5 was in court. And once in court, she testified, I 6 think, she had a four-wheeler wreck or something. 7 And one of the deputies -- or bailiffs, 8 actually, said that as they went out the back 9 door -- they made a comment that "They got by with 10 that one." And I think his name was Rob Wilkerson. 11 COURT REPORTER: I'm sorry? 12 THE WITNESS: His name was Rob 13 Wilkerson, if that's the correct bailiff that was 14 working that day. One of them told me that when 15 they walked out the back door, they thought it was 16 funny because they had gotten by with that one. 17 MS. GRIFFITH CONTINUED: 18 Q. Meaning they believed that Worley had beat 19 her up?</p> <p>20 MR. CLARKE: Object to the form. You 21 can answer. 22 THE WITNESS: That in fact that's 23 what happened. But in my experience, 99 percent of 24 them come back, and they're on the side of the 25 person who done it.</p>	<p style="text-align: right;">Page 123</p> <p>1 MS. GRIFFITH CONTINUED: 2 Q. Why would Barbara Kitchens believe that 3 you're related to her? 4 A. That still is just -- I have no clue. 5 Q. So are you saying here today that you are 6 absolutely not related to Barbara Kitchens? 7 A. I need to check my family tree. 8 Absolutely not. I have no blood relatives in 9 Grenada County. 10 Q. So do you know of any of the instances 11 that Worley -- or I'm sorry. Scratch that. Do you 12 know -- have you ever talked to Sonja Willis about 13 Worley? 14 A. Yes. 15 Q. And what has she told you? Or what have 16 y'all discussed? 17 A. I've been in the room when -- I think 18 there was an incident -- I don't remember if it was 19 on the radio or in a room -- when she responded to 20 a call down there and she had to ask for backup. I 21 was not on the scene. I cannot remember if I was 22 working with the PD or the SO that day. But I 23 think he threatened to kill her. If. . . 24 Q. Have you ever spoken with her personally 25 about that?</p>
<p style="text-align: right;">Page 124</p> <p>1 A. I do not remember. 2 Q. Have you ever arrested Barbara Kitchens? 3 A. Since that incident, I have. 4 Q. What did you arrest her for? 5 A. Possession of controlled substance, 6 resisting. 7 Q. What did she have in her possession? 8 A. Crystal -- what I believe to be crystal 9 meth. And I think she pled guilty this time on 10 that. I'm -- that's what I've been told. I 11 haven't followed up with it. 12 Q. Is that the only time you have arrested 13 her? 14 A. To the best of my memory, yes. 15 MS. GRIFFITH: I don't have any 16 further questions. Ms. Riley might. 17 MS. RILEY: Just a couple. 18 EXAMINATION 19 BY MS. RILEY: 20 Q. Earlier when you were being asked 21 questions by plaintiff's counsel, you mentioned 22 that once you and Randy Sweat and Bryant Griffin 23 got to the -- once y'all were at the hospital, at 24 one point you told Sweat to take Bull, or 25 Mr. Griffin, away. Is that correct?</p>	<p style="text-align: right;">Page 125</p> <p>1 A. Yes, ma'am. 2 Q. And I believe you mentioned earlier that 3 the reason you asked him to be taken away is 4 because you didn't need an escalation. Is that 5 right? 6 A. Yes, ma'am. 7 Q. But you weren't saying that Deputy Griffin 8 was escalating the situation, were you? 9 A. It was a potential. I didn't say he was 10 escalating. I was saying there was a potential 11 because of the language that had been used. He's 12 pretty up -- pretty up with the N word. And it had 13 been used several times on the way to the ER. 14 And I didn't need another incident to 15 escalate. So to keep it from escalating, I told 16 Sweat he had to take him away. Mr. Worley never 17 saw him, because I stopped them at the door. And -- 18 Q. So Deputy Griffin, he never -- he wasn't 19 saying that he wanted to fight Mr. Worley, was he? 20 A. No. No, ma'am. Not to my knowledge. 21 Q. Y'all weren't having to hold him off of 22 him or anything? 23 A. No, ma'am. No, ma'am. This was -- at the 24 door, I stopped them and said, "He can't come in 25 here. I don't need this."</p>

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<p style="text-align: right;">Page 126</p> <p>1 MR. CLARKE: Are you talking about 2 the hospital door?</p> <p>3 THE WITNESS: At the emergency room 4 door, yes, sir.</p> <p>5 MS. RILEY CONTINUED:</p> <p>6 Q. And just to be clear, in the sally port, 7 when Deputy Griffin was taking the plaintiff out of 8 your truck, you weren't sitting in your truck, 9 right?</p> <p>10 A. No, ma'am. I was standing at the open 11 door between me and him. I had come around -- I 12 secured my weapon in the front passenger 13 floorboard, closed my door, and came around. And 14 as I come around, the door was open. So I couldn't 15 see what was happening on the other side.</p> <p>16 Q. And what were you actually doing on the 17 other side of the door?</p> <p>18 A. When I first approached it and thought I 19 saw him swing, I told him to stop, let's get him 20 inside.</p> <p>21 Q. But what were you doing? Were you just 22 standing on the other side of the door?</p> <p>23 A. As I approached it, that's when it all 24 went down. We're talking about -- from the front 25 of the truck to the door to him getting him out,</p>	<p style="text-align: right;">Page 127</p> <p>1 we're talking about three to four seconds, five 2 seconds. Everything happened pretty quick. This 3 didn't go on for a minute or two. It was pretty 4 quick on everything.</p> <p>5 Q. And you mentioned that you had concerns 6 about your own safety, so you called for dispatch 7 -- I mean, for backup. Is that correct?</p> <p>8 A. I called dispatch and I asked that I have 9 backup inside the jail because of the threats that 10 had been made.</p> <p>11 Q. Did you share those threats with Officer 12 Sweat?</p> <p>13 A. I never talked to Officer Sweat until -- I 14 think the first time I even spoke to Sweat was at 15 the ER door. The way everything went down, I went 16 straight -- you know, I spoke -- I said what I said 17 to Bull. To the best of my knowledge, I walked in 18 and went straight in the control tower.</p> <p>19 At some point -- I stayed there to take 20 him. And the next time I saw him, he come in the 21 back door of the ER. I never remember speaking to 22 him. Now, what they heard on the radio in the 23 background, I'm not sure what all they could hear.</p> <p>24 Q. When you called -- when you called 25 dispatch, was it through your radio, and so it came</p>
<p style="text-align: right;">Page 128</p> <p>1 across the radio?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Does Officer Sweat have a radio in his 4 vehicle?</p> <p>5 A. We carry personal handhelds. We don't 6 have mobile -- we don't have fixed radios. We've 7 got -- they're on our belt, and we can take them 8 on, off, whatever.</p> <p>9 Q. Does Deputy Griffin -- does he have one of 10 those radios as well?</p> <p>11 A. Whether or not he had one -- I would 12 assume he did. Not a -- they're there. And it's 13 for your safety to take one with you. The problem 14 is, you've got two radios, well, they echo. So 15 usually, if you have somebody in the vehicle, one 16 of you has to keep it turned down until you get 17 out. Or off.</p> <p>18 Q. But those radios are loud enough, 19 generally, if you're sitting next to each other in 20 a vehicle, like a patrol vehicle --</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. You would -- both people would hear it?</p> <p>23 A. Yes, ma'am. It's according to -- well, I 24 can't speak for that, because I don't have a radio 25 on, period. There's not a radio on in that truck.</p>	<p style="text-align: right;">Page 129</p> <p>1 I listen to that radio, and radio only, when I'm in 2 the vehicle. And I don't like other people in 3 there for that reason, talking, so I can hear the 4 radio. I can't answer what their situation was.</p> <p>5 MS. RILEY: I'm looking over my notes 6 to make sure I haven't forgotten anything.</p> <p>7 All right. That's all I have.</p> <p>8 FURTHER EXAMINATION</p> <p>9 BY MR. CLARKE:</p> <p>10 Q. Do you know what happened to the charges 11 that you brought against Mr. Worley?</p> <p>12 A. I do not. I don't remember whether he 13 pled guilty. I did not look to . . .</p> <p>14 Q. Did you have to testify in court ever?</p> <p>15 A. Could I clarify that? That's the joke 16 that I -- about being kin to her. That's the most 17 packed courtroom we've every had in my history of 18 either one. He hired an attorney, and before it 19 even started, in front of everybody, he asked me 20 upfront had I -- was I kin to her. And that just 21 threw me for a loop. And --</p> <p>22 Q. I don't want that. I don't want that.</p> <p>23 A. Okay.</p> <p>24 Q. What I'm saying is, did you ever testify 25 in court?</p>

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<p style="text-align: right;">Page 130</p> <p>1 A. I can't honestly answer if he went on and 2 pled guilty or if it was court testimony. I would 3 have to go back to justice court to find out. 4 MR. CLARKE: All right. I think I'm 5 done, except, did you find out if there's any other 6 document? You said you were emailing the sheriff's 7 office to see if there were any other documents. 8 MS. GRIFFITH: We talked about that 9 at the break, and he believes he has it on his 10 computer, and he'll get it to us by tomorrow. 11 THE WITNESS: Are you going to 12 explain the process of arrest report and affidavit? 13 MS. GRIFFITH: Yeah. It's my 14 understanding from -- that if there was an arrest 15 -- an actual arrest report, it just would have been 16 a handwritten thing that was given to the sheriff 17 and given to booking. And those are not apparently 18 saved. That's just to allow the person to state -- 19 MR. CLARKE: What the charges are? 20 MS. GRIFFITH: Yeah. And so he would 21 have then gone to sign an affidavit on the actual 22 charges. But Danny believes that he does have a 23 second incident report, and he said he will get 24 that and email to me by first thing in the morning. 25 MR. CLARKE: Okay. Well, will he be</p>	<p style="text-align: right;">Page 131</p> <p>1 able to come back here tomorrow so I can question 2 him about it? 3 THE WITNESS: Yes, sir. 4 MR. CLARKE CONTINUED: 5 Q. Okay. And let me just ask you something 6 about it, because I thought that when I questioned 7 you, you didn't know if you had a report. Why do 8 you think you have a report on your personal... 9 A. I'm pretty sure -- I went by today to see 10 -- to refresh my memory, and I remember finding 11 that second report that's there. 12 Q. Is that report -- 13 A. It's not this one. 14 Q. I understand that. Is it on the same 15 format as that? 16 A. Yes, sir. 17 Q. Okay. So you would have a cover sheet and 18 then a narrative at the end? 19 A. Yes, sir. It would have its own case 20 number. That case number is 1669? Yes, sir. 21 There's another one that was done later for the 22 second. I had two different case numbers. 23 Q. Okay. All right. And if you can get 24 that. I didn't find one that was produced in 25 discovery.</p>
<p style="text-align: right;">Page 132</p> <p>1 MR. CLARKE: If you can -- we'll just 2 ask him about that report in the morning? 3 MS. GRIFFITH: Do you want to be here 4 at 8:30 or 9:00? 5 MR. CLARKE: Whatever. I'm going to 6 stay here tonight, so whatever is good for you to 7 start. 8 MS. GRIFFITH: What would work for 9 you? 10 THE WITNESS: I get up at 4:30 or 11 5:00. 12 MR. CLARKE: You're going to be up 13 for a while. 14 THE WITNESS: Drink coffee and eat 15 breakfast. 16 MS. GRIFFITH: Bethany, do you think 17 a court reporter could be here by 9:00? 18 COURT REPORTER: Yes. Yes. 19 MS. GRIFFITH: I think the -- I don't 20 think this office building actually opens until 21 9:00. So perhaps we might just want to come at 22 9:00, if that would be okay with you. 23 THE WITNESS: Be fine with me. 24 MR. CLARKE: And you will email it to 25 her, and you can email it to me.</p>	<p style="text-align: right;">Page 133</p> <p>1 MS. GRIFFITH: Uh-huh (affirmative 2 response). 3 MR. CLARKE: And if I don't need to 4 ask questions about it, I'll let you know. 5 MS. GRIFFITH: Okay. 6 MR. CLARKE: I mean, you know, I 7 don't want you to -- I don't ask questions unless I 8 have questions. 9 MS. GRIFFITH: Okay. Well, do we 10 want to just plan on starting at 9:00, regardless, 11 and if for some reason you don't want to talk to 12 him, I'll try to get Donny Willis here at 9:00? 13 MR. CLARKE: Whatever. I don't know 14 what the schedule is. So we're going to reset 15 Gholston and Sweat. 16 MS. GRIFFITH: That's fine with me. 17 COURT REPORTER: Are we off now? 18 MR. CLARKE: Yeah. I'm sorry. 19 (DEPOSITION CONCLUDED APPROXIMATELY 4:37 P.M.) 20 (READING AND SIGNING IS NOT WAIVED.) 21 22 ORIGINAL: ANDREW CLARKE 23 COPIES: MARY MCKAY GRIFFITH 24 KATELYN RILEY 25</p>

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<p style="text-align: right;">Page 134</p> <p>1 CERTIFICATE OF REPORTER 2 I, BETHANY CAMMACK, Certified Shorthand 3 Reporter and Notary Public for the State of 4 Mississippi, do hereby certify that the above and 5 foregoing pages contain a full, true and correct 6 transcript of the proceedings, as taken by me at 7 the time and place indicated, and later reduced to 8 typewritten form under my supervision and to the 9 best of my skill and ability.</p> <p>10 I further certify that I placed the 11 witness under oath to tell the truth and that all 12 answers were given under that oath. I further 13 certify that the witness has chosen the right to 14 not waive the reading and signing of the deposition.</p> <p>15 I further certify that I am not in the 16 employ of or related to any counsel or party in 17 this matter, and have no interest, monetary or 18 otherwise, in the final outcome of this case.</p> <p>19 Witness my signature and seal this 20 the 31st day of August, 2018.</p> <p>21 </p> <p>22 BETHANY CAMMACK, CSR 23 CSR NO. 1526 24 My Commission Expires May 1, 2019</p>	<p style="text-align: right;">Page 135</p> <p>1 CERTIFICATE OF DEPONENT 2 3 I, _____, do hereby 4 certify that the foregoing testimony is true and 5 accurate to the best of my knowledge and belief, as 6 originally transcribed, or with the changes as 7 noted on the attached Correction Sheet.</p> <p>8 9 (SIGNATURE)</p> <p>10 11 12 13 14 15 Subscribed and sworn to before me this the 16 day of _____, 2018.</p> <p>17 18 My Commission Expires: 19 20 (NOTARY PUBLIC)</p>
<p style="text-align: right;">Page 136</p> <p>1 CORRECTION SHEET 2 3 I, _____, do hereby 4 certify that the following corrections and 5 additions are true and accurate to the best of my 6 knowledge and belief.</p> <p>7 8 PAGE: LINE: SHOULD READ: REASON FOR CHANGE: 9 10 11 12 13 14 _____ 15 16 17 18 (SIGNATURE)</p> <p>19 20 Subscribed and sworn to before me this the 21 day of _____, 2018.</p> <p>22 23 My Commission Expires: 24 25 (NOTARY PUBLIC)</p>	

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